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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

RICOH COMPANY, LTD.,)
Plaintiff,) **CASE NO. C-03-4669-MJJ (EMC)**
vs.) **CASE NO. C-03-2289-MJJ (EMC)**
AEROFLEX INCORPORATED, et al.,)
Defendants) **DECLARATION OF KENNETH W.**
SYNOPSYS, INC.,) **BROTHERS IN SUPPORT OF RICOH'S**
Plaintiff,) **RESPONSE TO DEFENDANTS' NOTICE OF**
vs.) **MOTION AND CORRECTED MOTION TO**
RICOH COMPANY, LTD.,) **COMPEL DISCOVERY**
Defendant.)

DECLARATION OF KENNETH W. BROTHERS IN SUPPORT OF RICOH'S RESPONSE TO DEFENDANTS' NOTICE OF MOTION AND
CORRECTED MOTION TO COMPEL DISCOVERY
CASE NOS. C-03-2289-MJ(EMC) & CV-03-4669-MJ(EMC)

Kenneth W. Brothers declares as follows:

1. My name is Kenneth W. Brothers, an attorney with the law firm of Dickstein, Shapiro, Morin & Oshinsky, LLP, counsel for Ricoh Company Limited. I am over the age of 21 and am competent to make this declaration. Based on my personal knowledge and information, I hereby declare to all the facts in this declaration.

2. As Ricoh promised during the meet and confers on June 2, 5 and 6, between June 8 and 13 it responded to and/or supplemented its responses to Defendants' interrogatories and requests for admission. These responses and supplemental responses were served within six business days of Defendants' counsel first raising the issues, and after hundreds of man-hours of work by Ricoh's counsel.

3. Ricoh and its counsel have made repeated comprehensive searches at multiple locations in Japan and the U.S., including both hard copy and electronic, and have produced all relevant responsive non-privileged documents.

4. During a meet and confer on June 15, defendants' counsel expressly acknowledged Ricoh's representation that it had repeatedly searched for and produced all such documents, but refused to withdraw that portion of its motion and instead insisted that Ricoh respond to the motion. Defendants' counsel said that it would wait until its reply brief to decide whether it would withdraw the Ricoh-related document issues.

5. Defendants have served in excess of 450 numbered interrogatories, 900 numbered requests for admission, and hundreds of document requests. Counting subparts and multiplied on a product by product basis, these comprise thousands upon thousands of requests. I believe that many of these requests were served in bad faith, knowing they were so abusive that they would not be sustained, but withdrawn only after Ricoh responded. For example, on December 30 and 31, 2005, defendants served 626 numbered requests for admission, which actually contained more than ten thousand requests. Only after Ricoh responded to those excessive requests, and after prolonged negotiations, did defendants eventually withdraw them, then served an additional 274 requests.

DECLARATION OF KENNETH W. BROTHERS IN SUPPORT OF RICOH'S RESPONSE TO DEFENDANTS' NOTICE OF MOTION AND
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6. Ricoh repeatedly searched for responsive documents and had advised defendants of this fact. Ricoh is not withholding any relevant, responsive non-privileged documents in its possession, custody or control.

7. Despite repeated requests from Ricoh's counsel and from the Court's law clerks, defendants still have not provided a comprehensive list of which interrogatories and requests are at issue. As recently as the evening of June 15, defendants' counsel could not say whether a large number of interrogatories were still at issue.

8. Counting the products that were disclosed for the first time in May of this year pursuant to this Court's May 8, 2006 Order, there are now 452 different accused ASIC products at issue.

9. Earlier this year, defendants finally agreed to mutually exchange privilege logs in April 2006. The parties have agreed that the delay in exchanging logs was not a waiver of the privilege, and defendants do not make that argument in their papers. As part of the discussions that led to the exchange of the logs, the parties agreed that communications between clients and counsel need not be logged. As a result, counsel for all of the parties have excluded all communications between client and counsel from their logs.

10. Just today, Ricoh learned from a deposition of third party Texas Instruments that TI had multiple discussions with Synopsys regarding Ricoh's '432 patent in 2000. The TI corporate designee understood that Synopsys was having internal discussions regarding the patent (which almost certainly resulted in the creation of emails and other documents), but Synopsys has *never* produced or logged any Synopsys documents regarding either its discussions with TI or its internal review and analysis of the '432 patent.

11. Defendants have not logged their communications between themselves regarding the ‘432 patent or this litigation, even though some of those communications have been voluntarily produced. Even when privileged documents were inadvertently produced, they were never logged; when defendants produced (unlogged) emails between counsel and client regarding the July 2005 court-

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1 ordered declarations, those documents were never logged, even after this Court ordered that they be
2 returned.

3 12. Prior to the commencement of the litigation, as part of Ricoh's pre-filing investigation
4 into the patent, Ricoh's trial counsel (Mr. Hoffman) and a senior Ricoh representative from one of
5 Ricoh's legal departments (Mr. Takada) met with Mr. Shindo. Mr. Hoffman asked Mr. Takada to
6 prepare and send to him a summary of Mr. Takada's impressions of the meeting. The memo was never
7 shown to Mr. Shindo. It discussed Ricoh's legal strategy and communications between Mr. Hoffman
8 and Mr. Takada. These facts repeatedly were made known to defendants. Further, the memo was
9 prepared at the request of counsel in anticipation of litigation, and reflects Ricoh's legal strategy.

10 13. As part of Ricoh's searches, it contacted a large number of Ricoh employees who Ricoh
11 reasonably considered may have knowledge of or possession of relevant documents. Guided by Ricoh's
12 legal department and Ricoh's outside counsel, more than a dozen Ricoh employees were tasked to
13 conduct these interviews and search for documents. All potentially relevant responsive documents were
14 copied and subjected to another level of review for responsiveness and privilege. Those documents
15 were then processed and produced.

16 14. On June 15, defendants' counsel confirmed that the only third party documents that were
17 at issue in the motion were the KBSC documents. KBSC was never owned or controlled by Ricoh.
18 Defendants issued several subpoenas to Dr. Kobayashi and his companies, and a large volume of
19 documents were produced from locations in South Carolina and California. Those documents have
20 always been maintained and controlled by KBSC, not Ricoh. During a meet and confer on June 12,
21 Ricoh's counsel explained to defendants' counsel that the KBSC documents were not in Ricoh's
22 possession, custody or control. The KBSC documents were produced pursuant to several third party
23 subpoenas from defendants. To the best of Ricoh's understanding, most of the KBSC documents are
24 located in a locked KBSC storage facility located in Mountain View, California, and have been for
25 years. Ricoh understands that a few KBSC documents may also have been stored in a South Carolina
26 condominium to which Dr. Kobayashi has access. Neither Ricoh nor its counsel has access to either of
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28 DECLARATION OF KENNETH W. BROTHERS IN SUPPORT OF RICOH'S RESPONSE TO DEFENDANTS' NOTICE OF MOTION AND
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1 those facilities. Access to those documents is controlled by KBSC's officers, all of whom have been
2 deposed in this action.

3 15. Ricoh understands that, in 2003, Dr. Kobayashi and another KBSC officer named Brian
4 Bershader, in response to defendants' subpoenas, reviewed and selected documents that they considered
5 to be potentially responsive. Ricoh's counsel did not participate in the review and selection of those
6 documents. Instead, Dr. Kobayashi and Mr. Bershader reviewed and selected documents that they
7 considered to be responsive to the subpoenas, then delivered them to Ricoh's counsel for processing and
8 production to defendants. All KBSC documents were separately identified and separately labeled with a
9 "KBSC" bates number. The KBSC documents that had been sent to Ricoh's counsel were all returned
10 to KBSC. Dr. Kobayashi and Mr. Bershader were both deposed in 2004 and were asked about their
11 search for and production of documents pursuant to those subpoenas. Since that time, defendants have
12 not issued any additional subpoenas to KBSC, and have made no effort to move to compel with respect
13 to those subpoenas.

14 16. Ricoh's experts are presently completing their work on their expert disclosures, which
15 will fully set forth all of Ricoh's technical analysis.

16 17. Attached hereto as Ex. 1 is a true and correct copy of Ricoh's 6.8.06 Supp. Resp. to
17 Defendants RFAs (Nos. 1-144).

18 18. Ex. 2 is a true and correct copy of Ricoh's Responses to Matrox Tech.'s 2nd Set of
19 Interrogatories.

20 19. Attached hereto as Ex. 3 is a true and correct copy of Ricoh's Supplemental Response to
21 ASIC Defendants' Second Requests for Admissions (Nos. 145-274).

22 20. Ex. 4 is a true and correct copy of Ricoh's Restated Resp. to Matrox I.'s 3rd Set of
23 Interrogatories.

24 21. Attached hereto as Ex. 5 is a true and correct copy of Ricoh's Amended Responses to
25 Aeroflex Colorado's Restated 1st Set of Interrogatories (1-4).

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28 DECLARATION OF KENNETH W. BROTHERS IN SUPPORT OF RICOH'S RESPONSE TO DEFENDANTS' NOTICE OF MOTION AND
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1 22. Ex. 6 is a true and correct copy of Ricoh's 6.9.06 Restated Responses to AMI's 3rd Set of
2 Interrogatories.

3 23. Ex. 7 is a true and correct copy of Ricoh's 6.9.06 Restated Responses to Aeroflex Inc.'s
4 2nd Set of Interrogatories.

5 24. Ex. 8 is a true and correct copy of Ricoh's 6.10.06 Restated Responses to Aeroflex
6 Colorado Inc.'s 2nd Set of Interrogatories.

7 25. Ex. 9 is a true and correct copy of Ricoh's 6.12.06 Restated Responses to MGI's 2nd Set
8 of Interrogatories.

9 26. Ex. 10 is a true and correct copy of Ricoh's 6.13.06 Restated Responses to Matrox
10 Electronic Systems' 2nd Set of Interrogatories.

11 27. Attached hereto as Ex. 11 is a true and correct copy of the June 8, 2006, Brothers letter to
12 De Mory.

13 28. Attached hereto as Ex. 12 is a true and correct copy of the June 14, 2006, De Mory email
14 to Brothers.

15 29. Attached hereto as Ex. 13 is a true and correct copy of Synopsys, Inc.'s Response to
16 Defendant Ricoh's Second Set of Interrogatories to Plaintiff Synopsys.

17 30. Attached hereto as Ex. 14 is a true and correct copy of Synopsys, Inc.'s April 24, 2006,
18 privilege log.

19 31. Attached hereto as Ex. 15 is a true and correct copy of Plaintiff's deposition exhibits 245
20 (SP22701), 246 (SP22700) and 247 (DEF071902-906).

21 32. Attached hereto as Ex. 16 is a true and correct copy of Ricoh's April 24, 2006, privilege
22 log.

23 33. Attached hereto as Ex. 17 is a true and correct copy of the January 21, 2004, Meilman ltr
24 to Kelley.

25 34. Attached hereto as Ex. 18 is a true and correct copy of Synopsys' subpoenas of Brian
26 Bershad, served August 2, 2004, and of Hideaki Kobayashi, served June 5, 2003.

1 35. Attached hereto as Ex. 19 is a true and correct copy of Synopsys, Inc.'s Response to
2 Defendant Ricoh's Second Set of Interrogatories to Plaintiff Synopsys.

3 36. Attached hereto as Ex. 20 is a true and correct copy of Defendant Aeroflex
4 Incorporated's First Set of Interrogatories (1-11).

5 I declare under penalty of perjury under the laws of the United States of America that the
6 foregoing is true and correct. Signed at Washington, D.C. on June 16, 2006.

7
8 June 16, 2006

/s/ Kenneth W. Brothers

Kenneth W. Brothers

Exhibit 1

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¹⁴ Attorneys for the Ricoh Company, Ltd.

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

18)
19 RICOH COMPANY, LTD,) Case No. C03-04669 MJJ (EMC)
20 Plaintiff,)
21 vs.) RICOH'S SUPPLEMENTAL RESPONSE
22 Aeroflex et al.,) TO ASIC DEFENDANTS' REQUESTS
23 Defendants.) FOR ADMISSIONS (Nos. 1-144)
-----)

Pursuant to Rules 26 and 36 of the Federal Rules of Civil Procedure, Ricoh Company, Ltd., (“Ricoh”) hereby responds to ASIC defendants’ Requests for Admission (Nos. 1-144).

28 RICOH'S SUPPLEMENTAL RESPONSE TO ASIC DEFENDANTS' REQUESTS FOR ADMISSIONS Ricoh v. Aeroflex C03-04669 MJU (EMC)

These responses are based on information reasonably available to Ricoh at the present time.

2 Ricoh reserves the right to supplement these responses when, and if, additional information becomes
3 available. Ricoh also reserves the right to object on any ground at any time to such other or
4 supplemental Requests for Admission ASIC defendants may propound involving or relating to the
5 subject matter of these Requests.

OBJECTIONS

7 1. Ricoh objects to all of the Requests to the extent that they seek information or documents
8 protected by the attorney-client privilege, the work product doctrine, and/or any other privilege or
9 immunity. Ricoh does not intend to provide ASIC defendants. (“ASIC defendants” or “defendants”)
10 with such protected information. Moreover, any inadvertent disclosure of such information, or any
11 disclosure of documents underlying that information, shall not be deemed a waiver of the attorney-
12 client privilege, the work product doctrine, or any other privilege or immunity.

13 2. Ricoh objects to all of the Requests to the extent that they seek information that is subject to
14 any protective order, privacy interest, contractual obligation, non-disclosure agreement, confidentiality
15 agreement or other such confidentiality obligation owed to any third party. Without third party
16 permission, Ricoh will not provide such information unless required by the Court.

17 3. Ricoh objects to all of the Requests to the extent that they seek to impose an obligation of a
18 continuing nature beyond that required by FRCP 26(e).

19 4. Ricoh objects to all of the Requests to the extent that they seek to impose a premature
20 obligation to provide information in light of Patent Local Rules, including, but not limited to, Patent
21 Local Rule 2-5.

22 5. Ricoh objects to all of the Requests as overly broad and unduly burdensome to the extent that
23 they seek information beyond what is available from a reasonable search of Ricoh's files likely to
24 contain relevant or responsive documents and a reasonable inquiry of Ricoh's current employees.

25 6. Ricoh objects to all of the Requests as unduly burdensome to the extent that they seek
26 information that can be determined from a reasonable search of ASIC defendants' own internal files

1 and a reasonable inquiry of ASIC defendants' own employees, as such it would be more convenient,
 2 less burdensome, less expensive for ASIC defendants to perform an internal search.

3 7. Ricoh objects to the definition of "'Ricoh,' 'Plaintiff,' 'you,' and 'your'" because the phrase
 4 "predecessors in interest" both is vague so as to not be clear and comprehensible and also is overly
 5 broad because the phrase purports to include independent third parties (e.g., International Chip
 6 Corporation and Knowledge Based Silicon Corporation). In responding to these requests, Ricoh limits
 7 its response to Ricoh Company, Ltd. However, if specifically requested, Ricoh may be willing to
 8 provide information relating to the International Chip Corporation and Knowledge Based Silicon
 9 Corporation if such information is within Ricoh's possession, custody and control. Further, with
 10 respect to Requests seeking information from individual persons within Ricoh, Ricoh limits its
 11 response to current employees. Ricoh objects to all of the Requests as overly broad and unduly
 12 burdensome to the extent that they seek information beyond what is available from a reasonable search
 13 of Ricoh's files likely to contain relevant or responsive documents and a reasonable inquiry of Ricoh's
 14 current employees.

15 8. Ricoh objects to all of the Requests as being unduly burdensome because of the excessive
 16 number of Requests.

17 9. Ricoh objects to all of the Requests to the extent that the request seeks information that is not
 18 reasonably calculated to lead to the discovery of admissible evidence.

19 10. Ricoh objects to all of the Requests to the extent that the request seeks information that is
 20 before the relevant time period. As such, in its response to any Request, Ricoh limits the relevant time
 21 period to 1997 to the present.

22 11. Ricoh objects to all of the Requests to the extent that the request seeks information that is
 23 contentious, and Ricoh has not yet provided its final contentions and responses to contentions.

24 12. Ricoh objects to all of the Requests to the extent that the request seeks information that is the
 25 subject of expert testimony or expert opinion, and expert testimony and/or expert opinion is premature.

26 13. In gathering relevant and responsive information, Ricoh has interpreted the Requests utilizing
 27 ordinary meanings of words and has expended reasonable efforts to identify information that appears

1 responsive. To the extent that the Requests purport to seek information other than as so interpreted,
 2 Ricoh objects on the ground that the Requests are vague, ambiguous and overbroad.

3 14. Discovery and trial preparation in this matter have not been completed. Ricoh is continuing its
 4 investigation to obtain information responsive to the Requests. Therefore, all of the following
 5 responses are given without prejudice to Ricoh's right to introduce documents or information
 6 discovered or deemed responsive subsequent to the date of these responses.

7 15. Any statements made herein regarding Ricoh's intention to provide information or documents
 8 responsive to any given Requests does not necessarily indicate or imply the existence of any
 9 information or documents responsive thereto. Furthermore, any information provided or referred to
 10 herein is not deemed to be a waiver of Ricoh's objections as to the competency, relevance, privilege or
 11 admissibility of evidence in this or any subsequent proceeding or trial in this or any other action for
 12 any purpose whatsoever. In addition, Ricoh reserves the right to supplement or amend its response to
 13 the Requests based upon information, documents, and things it receives during discovery or obtains
 14 upon further investigation.

15 REQUEST FOR ADMISSION NO. 1:

16 Admit that on or before January 1, 1995 Ricoh used any version of Synopsys' Design Compiler
 17 product that existed on or before January 1, 1995 for logic synthesis of ASICs.

18 RESPONSE:

19 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms "used any
 20 version of Synopsys' Design Compiler product that existed on or before January 1, 1995 for logic
 21 synthesis of ASICs" as being vague and ambiguous as to what the defendants may mean by the terms.
 22 Ricoh further objects that discovery into Ricoh's use of Design Compiler is not reasonably calculated
 23 to lead to admissible evidence, because Judge Jenkins has already rejected Defendants' attempt to
 24 expand their laches defense to include Ricoh's use of Design Compiler. For at least those reasons,
 25 Ricoh cannot respond to the Request, and therefore denies same.

26 REQUEST FOR ADMISSION NO. 2:

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28 RICOH'S SUPPLEMENTAL RESPONSE TO ASIC DEFENDANTS' REQUESTS FOR ADMISSIONS Ricoh v. Aeroflex C03-04669 MJJ (EMC)

1 Admit that on or before January 1, 1995 Ricoh used any version of Synopsys' Design Compiler
 2 product that existed on or before January 1, 1995 to design ASICs.

3 **RESPONSE:**

4 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms "used any version
 5 of Synopsys' Design Compiler product that existed on or before January 1, 1995 to design ASICs" as
 6 being vague and ambiguous as to what the defendants may mean by the terms. Ricoh further objects
 7 that discovery into Ricoh's use of Design Compiler is not reasonably calculated to lead to admissible
 8 evidence, because Judge Jenkins has already rejected Defendants' attempt to expand their laches
 9 defense to include Ricoh's use of Design Compiler. For at least those reasons, Ricoh cannot respond
 10 to the Request, and therefore denies same.

11 **REQUEST FOR ADMISSION NO. 3:**

12 Admit that on or before January 1, 1995 Ricoh used any version of Synopsys' HDL Compiler for
 13 Verilog product that existed on or before January 1, 1995 for logic synthesis of ASICs.

14 **RESPONSE:**

15 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms "used any version
 16 of Synopsys' HDL Compiler for Verilog product that existed on or before January 1, 1995 for logic
 17 synthesis of ASICs" as being vague and ambiguous as to what the defendants may mean by the terms.
 18 Ricoh further objects that discovery into Ricoh's use of HDL Compiler is not reasonably calculated to
 19 lead to admissible evidence, because Judge Jenkins has already rejected Defendants' attempt to expand
 20 their laches defense to include Ricoh's use of HDL Compiler. For at least those reasons, Ricoh cannot
 21 respond to the Request, and therefore denies same.

22 **REQUEST FOR ADMISSION NO. 4:**

23 Admit that on or before January 1, 1995 Ricoh used any version of Synopsys' HDL Compiler for
 24 Verilog product that existed on or before January 1, 1995 to design ASICs.

25 **RESPONSE:**

26 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms "used any version
 27 of Synopsys' HDL Compiler for Verilog product that existed on or before January 1, 1995 to design

1 "ASICS" as being vague and ambiguous as to what the defendants may mean by the terms. Ricoh
 2 further objects that discovery into Ricoh's use of HDL Compiler is not reasonably calculated to lead
 3 to admissible evidence, because Judge Jenkins has already rejected Defendants' attempt to expand
 4 their laches defense to include Ricoh's use of HDL Compiler. For at least those reasons, Ricoh cannot
 5 respond to the Request, and therefore denies same.

6 REQUEST FOR ADMISSION NO. 5:

7 Admit that on or before January 1, 1995 Ricoh used any version of Synopsys' VHDL Compiler
 8 product that existed on or before January 1, 1995 for logic synthesis of ASICS.

9 RESPONSE:

10 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms "any version of
 11 Synopsys' VHDL Compiler product that existed on or before January 1, 1995 for logic synthesis of
 12 ASICS" as being vague and ambiguous as to what the defendants may mean by the terms. Ricoh
 13 further objects that discovery into Ricoh's use of VHDL Compiler is not reasonably calculated to lead
 14 to admissible evidence, because Judge Jenkins has already rejected Defendants' attempt to expand
 15 their laches defense to include Ricoh's use of VHDL Compiler. For at least those reasons, Ricoh
 16 cannot respond to the Request, and therefore denies same.

17 REQUEST FOR ADMISSION NO. 6:

18 Admit that on or before January 1, 1995 Ricoh used any version of Synopsys' VHDL Compiler
 19 product that existed on or before January 1, 1995 to design ASICS.

20 RESPONSE:

21 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms "used any version
 22 of Synopsys' VHDL Compiler product that existed on or before January 1, 1995 to design ASICS." as
 23 being vague and ambiguous as to what the defendants may mean by the terms. Ricoh further objects
 24 that discovery into Ricoh's use of VHDL Compiler is not reasonably calculated to lead to admissible
 25 evidence, because Judge Jenkins has already rejected Defendants' attempt to expand their laches
 26 defense to include Ricoh's use of VHDL Compiler. For at least those reasons, Ricoh cannot respond
 27 to the Request, and therefore denies same.

1 REQUEST FOR ADMISSION NO. 7:

2 Admit that Ricoh was aware on or before January 1, 1997 that Synopsys had licensed any version of
3 Synopsys' Design Compiler product that existed on or before January 1, 1997 to companies other than
4 Ricoh.

5 RESPONSE:

6 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms "had licensed any
7 version of Synopsys' Design Compiler product that existed on or before January 1, 1997 to companies
8 other than Ricoh" as being vague and ambiguous as to what the defendants may mean by the terms.
9 Ricoh further objects that discovery into Ricoh's or other third parties' use of Design Compiler is not
10 reasonably calculated to lead to admissible evidence, because Judge Jenkins has already rejected
11 Defendants' attempt to expand their laches defense to include Ricoh's use of Design Compiler. For at
12 least those reasons, Ricoh cannot respond to the Request, and therefore denies same.

13 REQUEST FOR ADMISSION NO. 8:

14 Admit that Ricoh was aware on or before January 1, 1997 that Synopsys had licensed any version of
15 Synopsys' HDL Compiler for Verilog product that existed on or before January 1, 1997 to companies
16 other than Ricoh.

17 RESPONSE:

18 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms "had licensed any
19 version of Synopsys' HDL Compiler for Verilog product that existed on or before January 1, 1997 to
20 companies other than Ricoh" as being vague and ambiguous as to what the defendants may mean by
21 the terms. Ricoh further objects that discovery into Ricoh's or other third parties' use of HDL
22 Compiler is not reasonably calculated to lead to admissible evidence, because Judge Jenkins has
23 already rejected Defendants' attempt to expand their laches defense to include Ricoh's use of Design
24 Compiler. For at least those reasons, Ricoh cannot respond to the Request, and therefore denies same.

25 REQUEST FOR ADMISSION NO. 9:

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28 RICOH'S SUPPLEMENTAL RESPONSE TO ASIC DEFENDANTS' REQUESTS FOR ADMISSIONS Ricoh v. Aeroflex C03-04669 MJJ (EMC)

1 Admit that Ricoh was aware on or before January 1, 1997 that Synopsys had licensed any version of
2 Synopsys' VHDL Compiler product that existed on or before January 1, 1997 to companies other than
3 Ricoh.

4 RESPONSE:

5 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms "had licensed any
6 version of Synopsys' VHDL Compiler product that existed on or before January 1, 1997 to companies
7 other than Ricoh" as being vague and ambiguous as to what the defendants may mean by the terms.
8 Ricoh further objects that discovery into Ricoh's or other third parties' use of VHDL Compiler is not
9 reasonably calculated to lead to admissible evidence, because Judge Jenkins has already rejected
10 Defendants' attempt to expand their laches defense to include Ricoh's use of Design Compiler. For at
11 least those reasons, Ricoh cannot respond to the Request, and therefore denies same.

12 REQUEST FOR ADMISSION NO. 10:

13 Admit that Ricoh based its allegations that Matrox Graphics infringes the '432 patent at least in part
14 on information Ricoh obtained from Synopsys as part of Ricoh's licensing relationship with Synopsys.

15 RESPONSE:

16 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms "based its
17 allegations that Matrox Graphics infringes the '432 patent at least in part on information Ricoh
18 obtained from Synopsys as part of Ricoh's licensing relationship with Synopsys" as being vague and
19 ambiguous as to what the defendants may mean by the terms. Subject to these objections, Ricoh states
20 that it based its allegations in its amended complaint upon publicly available information and upon
21 Ricoh's analysis of that information. Otherwise, denied.

22 REQUEST FOR ADMISSION NO. 11:

23 Admit that Ricoh based its allegations that Matrox Electronic Systems infringes the '432 patent at
24 least in part on information Ricoh obtained from Synopsys as part of Ricoh's licensing relationship
25 with Synopsys.

26 RESPONSE:

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28 RICOH'S SUPPLEMENTAL RESPONSE TO ASIC DEFENDANTS' REQUESTS FOR ADMISSIONS Ricoh v. Aeroflex C03-04669 MJJ (EMC)

1 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms “based its
 2 allegations that Matrox Electronic Systems infringes the '432 patent at least in part on information
 3 Ricoh obtained from Synopsys as part of Ricoh’s licensing relationship with Synopsys” as being vague
 4 and ambiguous as to what the defendants may mean by the terms. Subject to these objections, Ricoh
 5 states that it based its allegations in its amended complaint upon publicly available information and
 6 upon Ricoh’s analysis of that information. Otherwise, denied.

7 REQUEST FOR ADMISSION NO. 12:

8 Admit that Ricoh based its allegations that Matrox Tech infringes the '432 patent at least in part on
 9 information Ricoh obtained from Synopsys as part of Ricoh’s licensing relationship with Synopsys.

10 RESPONSE:

11 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms “Ricoh based its
 12 allegations that Matrox Tech infringes the '432 patent at least in part on information Ricoh obtained
 13 from Synopsys as part of Ricoh’s licensing relationship with Synopsys” as being vague and ambiguous
 14 as to what the defendants may mean by the terms. Subject to these objections, Ricoh states that it based
 15 its allegations in its amended complaint upon publicly available information and upon Ricoh’s analysis
 16 of that information. Otherwise, denied

17 REQUEST FOR ADMISSION NO. 13:

18 Admit that Ricoh based its allegations that Matrox International infringes the '432 patent at least in
 19 part on information Ricoh obtained from Synopsys as part of Ricoh’s licensing relationship with
 20 Synopsys.

21 RESPONSE:

22 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms “based its
 23 allegations that Matrox International infringes the '432 patent at least in part on information Ricoh
 24 obtained from Synopsys as part of Ricoh’s licensing relationship with Synopsys” as being vague and
 25 ambiguous as to what the defendants may mean by the terms. Subject to these objections, Ricoh states
 26 that it based its allegations in its amended complaint upon publicly available information and upon
 27 Ricoh’s analysis of that information. Otherwise, denied

28 RICOH’S SUPPLEMENTAL RESPONSE TO ASIC DEFENDANTS’ REQUESTS FOR ADMISSIONS Ricoh v. Aeroflex C03-04669 MJJ (EMC)

1 REQUEST FOR ADMISSION NO. 14:

2 Admit that Ricoh based its allegations that Aeroflex, Inc. infringes the '432 patent at least in part on
3 information Ricoh obtained from Synopsys as part of Ricoh's licensing relationship with Synopsys.

4 RESPONSE:

5 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms "based its
6 allegations that Aeroflex, Inc. infringes the '432 patent at least in part on information Ricoh obtained
7 from Synopsys as part of Ricoh's licensing relationship with Synopsys" as being vague and ambiguous
8 as to what the defendants may mean by the terms. Subject to these objections, Ricoh states that it
9 based its allegations in its amended complaint upon publicly available information and upon Ricoh's
10 analysis of that information. Otherwise, denied

11 REQUEST FOR ADMISSION NO. 15:

12 Admit that Ricoh based its allegations that Aeroflex Colorado Springs infringes the '432 patent at
13 least in part on information Ricoh obtained from Synopsys as part of Ricoh's licensing relationship
14 with Synopsys.

15 RESPONSE:

16 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms "based its
17 allegations that Aeroflex Colorado Springs infringes the '432 patent at least in part on information
18 Ricoh obtained from Synopsys as part of Ricoh's licensing relationship with Synopsys" as being vague
19 and ambiguous as to what the defendants may mean by the terms. Subject to these objections, Ricoh
20 states that it based its allegations in its amended complaint upon publicly available information and
21 upon Ricoh's analysis of that information. Otherwise, denied

22 REQUEST FOR ADMISSION NO. 16:

23 Admit that Ricoh has unconditionally agreed not to sue Synopsys for infringement as to any claim of
24 the '432 patent.

25 RESPONSE:

26 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms "unconditionally
27 agreed not to sue Synopsys for infringement as to any claim of the '432 patent" as being vague and

28 RICOH'S SUPPLEMENTAL RESPONSE TO ASIC DEFENDANTS' REQUESTS FOR ADMISSIONS Ricoh v. Aeroflex C03-04669 MJJ (EMC)

1 ambiguous as to what the defendants may mean by the terms. Ricoh admits that, in the stipulated order
 2 of July 7, 2004, it reaffirmed its statement of July 14, 2003 that "Ricoh unconditionally agrees not to
 3 sue Synopsys for infringement as to any claim of the '432 patent and the '016 patent based upon the
 4 products currently manufactured, sold and used by Synopsys." To the extent not otherwise expressly
 5 stated in the order of July 7, 2004, denied.

6 REQUEST FOR ADMISSION NO. 17:

7 Admit that for more than 10 years, Ricoh has been using either VHDL or Verilog as input to any
 8 version of the Synopsys products-in-suit.

9 RESPONSE:

10 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms "using either
 11 VHDL or Verilog as input to any version of the Synopsys products-in-suit" as being vague and
 12 ambiguous as to what the defendants may mean by the terms. Ricoh further objects that discovery into
 13 Ricoh's use of products-in-suit is not reasonably calculated to lead to admissible evidence, because
 14 Judge Jenkins has already rejected Defendants' attempt to expand their laches defense to include
 15 Ricoh's use of products-in-suit. For at least those reasons, Ricoh cannot respond to this Request, and
 16 therefore denies same.

17 REQUEST FOR ADMISSION NO. 18:

18 Admit that for more than 10 years, Ricoh has used register-transfer level descriptions, as described in
 19 U.S. Patent No. 4,703,435 at Col. 5:27-34, as input to any version of the Synopsys products in suit.

20 RESPONSE:

21 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms "has used
 22 register-transfer level descriptions, as described in U.S. Patent No. 4,703,435 at Col. 5:27-34, as input
 23 to any version of the Synopsys products in suit" as being vague and ambiguous as to what the
 24 defendants may mean by the terms. Ricoh further objects that discovery into Ricoh's use of products-
 25 in-suit is not reasonably calculated to lead to admissible evidence, because Judge Jenkins has already
 26 rejected Defendants' attempt to expand their laches defense to include Ricoh's use of products-in-suit.
 27 For at least those reasons, Ricoh cannot respond to this Request, and therefore denies same.

28 RICOH'S SUPPLEMENTAL RESPONSE TO ASIC DEFENDANTS' REQUESTS FOR ADMISSIONS Ricoh v. Aeroflex C03-04669 MJJ (EMC)

1 REQUEST FOR ADMISSION NO. 19:

2 Admit that for more than 10 years, Ricoh has used RTL as input to any version of the Synopsys
3 products-in-suit.

4 RESPONSE:

5 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms "Ricoh has used
6 RTL as input to any version of the Synopsys products-in-suit" as being vague and ambiguous as to
7 what the defendants may mean by the terms. Ricoh further objects that discovery into Ricoh's use of
8 products-in-suit is not reasonably calculated to lead to admissible evidence, because Judge Jenkins has
9 already rejected Defendants' attempt to expand their laches defense to include Ricoh's use of products-
10 in-suit. For at least those reasons, Ricoh cannot respond to this Request, and therefore denies same.

11 REQUEST FOR ADMISSION NO. 20:

12 Admit that for more than 10 years, Ricoh has used register-transfer level descriptions, as described in
13 U.S. Patent No. 4,703,435 at Col. 5:27-34, as input to any version of Synopsys' VHDL Compiler
14 product.

15 RESPONSE:

16 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms "has used
17 register-transfer level descriptions, as described in U.S. Patent No. 4,703,435 at Col. 5:27-34, as input
18 to any version of Synopsys' VHDL Compiler product" as being vague and ambiguous as to what the
19 defendants may mean by the terms. Ricoh further objects that discovery into Ricoh's use of products-
20 in-suit is not reasonably calculated to lead to admissible evidence, because Judge Jenkins has already
21 rejected Defendants' attempt to expand their laches defense to include Ricoh's use of products-in-suit.
22 For at least those reasons, Ricoh cannot respond to this Request, and therefore denies same.

23 REQUEST FOR ADMISSION NO. 21:

24 Admit that for more than 10 years, Ricoh has used RTL as input to any version of Synopsys' HDL
25 Compiler for Verilog product.

26 RESPONSE:

27

28 RICOH'S SUPPLEMENTAL RESPONSE TO ASIC DEFENDANTS' REQUESTS FOR ADMISSIONS Ricoh v. Aeroflex C03-04669 MJJ (EMC)

1 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms "has used RTL as
 2 input to any version of Synopsys' HDL Compiler for Verilog product" as being vague and ambiguous
 3 as to what the defendants may mean by the terms. Ricoh further objects that discovery into Ricoh's
 4 use of products-in-suit is not reasonably calculated to lead to admissible evidence, because Judge
 5 Jenkins has already rejected Defendants' attempt to expand their laches defense to include Ricoh's use
 6 of products-in-suit. For at least those reasons, Ricoh cannot respond to this Request, and therefore
 7 denies same.

8 REQUEST FOR ADMISSION NO. 22:

9 Admit that the inputs for the accused ASICS that the Customer Defendants have produced in this
 10 litigation are either VHDL or Verilog.

11 RESPONSE:

12 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms "the inputs for
 13 the accused ASICS that the Customer Defendants have produced in this litigation are either VHDL or
 14 Verilog" as being vague and ambiguous as to what the defendants may mean by the terms. Ricoh
 15 further objects that his request is directed towards hundreds of products and is overbroad. Without
 16 waiving these objections, Ricoh incorporates by Reference its Final Infringement Contentions filed
 17 March 24, 2006 and any supplemental contentions and expert reports and testimony and expert reports
 18 and testimony. Except as specifically admitted therein, Ricoh denies the Request.

19 REQUEST FOR ADMISSION NO. 23:

20 Admit that the Verilog inputs for the accused ASICS that the Customer Defendants have produced in
 21 this litigation are register transfer level descriptions.

22 RESPONSE:

23 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms "the Verilog
 24 inputs for the accused ASICS that the Customer Defendants have produced in this litigation are
 25 register transfer level descriptions" as being vague and ambiguous as to what the defendants may mean
 26 by the terms. Ricoh further objects that his request is directed towards hundreds of products and is
 27 overbroad. Without waiving these objections, Ricoh incorporates by Reference its Final Infringement

1 Contentions filed March 24, 2006 and any supplemental contentions and expert reports and testimony
 2 and expert reports and testimony. Except as specifically admitted therein, Ricoh denies the Request.

3 REQUEST FOR ADMISSION NO. 24:

4 Admit that the VHDL inputs for the accused ASICS that the Customer Defendants have produced in
 5 this litigation are register transfer level descriptions.

6 RESPONSE:

7 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms "the VHDL
 8 inputs for the accused ASICS that the Customer Defendants have produced in this litigation are
 9 register transfer level descriptions" as being vague and ambiguous as to what the defendants may mean
 10 by the terms. Ricoh further objects that his request is directed towards hundreds of products and is
 11 overbroad. Without waiving these objections, Ricoh incorporates by Reference its Final Infringement
 12 Contentions filed March 24, 2006 and any supplemental contentions and expert reports and testimony
 13 and expert reports and testimony. Except as specifically admitted therein, Ricoh denies the Request.

14 REQUEST FOR ADMISSION NO. 25:

15 Admit that the Verilog inputs for the accused ASICS that the Customer Defendants have produced in
 16 this litigation are register-transfer level descriptions, as described in U.S. Patent No. 4,703,435 at Col.
 17 5:27-34.

18 RESPONSE:

19 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms "the Verilog
 20 inputs for the accused ASICS that the Customer Defendants have produced in this litigation are
 21 register-transfer level descriptions, as described in U.S. Patent No. 4,703,435 at Col. 5:27-34" as being
 22 vague and ambiguous as to what the defendants may mean by the terms. Ricoh further objects that his
 23 request is directed towards hundreds of products and is overbroad. Without waiving these objections,
 24 Ricoh incorporates by Reference its Final Infringement Contentions filed March 24, 2006 and any
 25 supplemental contentions and expert reports and testimony and expert reports and testimony. Except
 26 as specifically admitted therein, Ricoh denies the Request.

27 REQUEST FOR ADMISSION NO. 26:

28 RICOH'S SUPPLEMENTAL RESPONSE TO ASIC DEFENDANTS' REQUESTS FOR ADMISSIONS Ricoh v. Aeroflex C03-04669 MJJ (EMC)

1 Admit that the VHDL inputs for the accused ASICS that the Customer Defendants have produced in
2 this litigation are register-transfer level descriptions, as described in U.S. Patent No. 4,703,435 at Col.
3 5:27-34.

4 RESPONSE:

5 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms "the VHDL
6 inputs for the accused ASICS that the Customer Defendants have produced in this litigation are
7 register-transfer level descriptions, as described in U.S. Patent No. 4,703,435 at Col. 5:27-34" as being
8 vague and ambiguous as to what the defendants may mean by the terms. Ricoh further objects that his
9 request is directed towards hundreds of products and is overbroad. Without waiving these objections,
10 Ricoh incorporates by Reference its Final Infringement Contentions filed March 24, 2006 and any
11 supplemental contentions and expert reports and testimony and expert reports and testimony. Except
12 as specifically admitted therein, Ricoh denies the Request.

13 REQUEST FOR ADMISSION NO. 27:

14 Admit that generic operators are not examples of synthetic operators.

15 RESPONSE:

16 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms "generic
17 operators are not examples of synthetic operators" as being vague and ambiguous as to what the
18 defendants may mean by the terms. Ricoh admits that, in its March 24, 2006 infringement contentions,
19 it defined "generic operators" to include synthetic operators. Except as specifically admitted therein,
20 Ricoh denies this Request.

21 REQUEST FOR ADMISSION NO. 28:

22 Admit that HDL arithmetic operators are not "architecture independent actions" as set forth in Claim
23 13 of U.S. Patent No. 4,922,432.

24 RESPONSE:

25 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms "that HDL
26 arithmetic operators are not "architecture independent actions" as set forth in Claim 13 of U.S. Patent
27 No. 4,922,432" as being vague and ambiguous as to what the defendants may mean by the terms.

28 RICOH'S SUPPLEMENTAL RESPONSE TO ASIC DEFENDANTS' REQUESTS FOR ADMISSIONS Ricoh v. Aeroflex C03-04669 MJJ (EMC)

1 Ricoh further objects that this request is overbroad because it purports to address many different forms
 2 of HDL arithmetic operators, and cannot be answered in a single response. Without waiving these
 3 objections, Ricoh incorporates by reference its Final Infringement Contentions filed March 24, 2006
 4 and any supplemental contentions and expert reports and testimony and expert reports and testimony.
 5 Except as specifically admitted therein, Ricoh denies the Request.

6 REQUEST FOR ADMISSION NO. 29:

7 Admit that HDL arithmetic operators are not "architecture independent... conditions" as set forth in
 8 Claim 13 of U.S. Patent No. 4,922,432.

9 RESPONSE:

10 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms "HDL arithmetic
 11 operators are not "architecture independent... conditions" as set forth in Claim 13 of U.S. Patent No.
 12 4,922,432" as being vague and ambiguous as to what the defendants may mean by the terms. Ricoh
 13 further objects that this request is overbroad because it purports to address many different forms of
 14 HDL arithmetic operators, and cannot be answered in a single response. Without waiving these
 15 objections, Ricoh incorporates by reference its Final Infringement Contentions filed March 24, 2006
 16 and any supplemental contentions and expert reports and testimony. Except as specifically admitted
 17 therein, Ricoh denies the Request.

18 REQUEST FOR ADMISSION NO. 30:

19 Admit that synthetic operators are not "architecture independent... conditions" as set forth in Claim
 20 13 of U.S. Patent No. 4,922,432.

21 RESPONSE:

22 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms "synthetic
 23 operators are not "architecture independent... conditions" as set forth in Claim 13 of U.S. Patent No.
 24 4,922,432" as being vague and ambiguous as to what the defendants may mean by the terms. Ricoh
 25 further objects that this request is overbroad because it purports to address many different forms of
 26 synthetic operators, and cannot be answered in a single response. Without waiving these objections,
 27 Ricoh incorporates by reference its Final Infringement Contentions filed March 24, 2006 and any

1 supplemental contentions and expert reports and testimony. Subject to the foregoing objections, as
 2 Ricoh has defined the relevant terms in its Final Infringement Contentions, Ricoh admits the Request.
 3 REQUEST FOR ADMISSION NO. 31:

4 Admit that synthetic modules are not "architecture independent, .. conditions" as set forth in Claim
 5 13 of U.S. Patent No. 4,922,432,

6 RESPONSE:

7 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms "synthetic
 8 modules are not "architecture independent, .. conditions" as set forth in Claim 13 of U.S. Patent No.
 9 4,922,432" as being vague and ambiguous as to what the defendants may mean by the terms. Ricoh
 10 further objects that this request is overbroad because it purports to address many different forms of
 11 synthetic modules, and cannot be answered in a single response. Without waiving these objections,
 12 Ricoh incorporates by reference its Final Infringement Contentions filed March 24, 2006 and any
 13 supplemental contentions and expert reports and testimony. Subject to the foregoing objections, , as
 14 Ricoh has defined the relevant terms in its Final Infringement Contentions, Ricoh admits the Request.

15 REQUEST FOR ADMISSION NO. 32:

16 Admit that generic operators are not "architecture independent actions" as set forth in Claim 13 of
 17 U.S. Patent No. 4,922,432.

18 RESPONSE:

19 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms "generic
 20 operators are not "architecture independent actions" as set forth in Claim 13 of U.S. Patent No.
 21 4,922,432" as being vague and ambiguous as to what the defendants may mean by the terms. Ricoh
 22 further objects that this request is overbroad because it purports to address many different forms of
 23 generic operators, and cannot be answered in a single response. Without waiving these objections,
 24 Ricoh incorporates by reference its Final Infringement Contentions filed March 24, 2006 and any
 25 supplemental contentions and expert reports and testimony. Subject to the foregoing objections, , as
 26 Ricoh has defined the relevant terms in its Final Infringement Contentions, Ricoh admits the Request.

27 REQUEST FOR ADMISSION NO. 33:

28 RICOH'S SUPPLEMENTAL RESPONSE TO ASIC DEFENDANTS' REQUESTS FOR ADMISSIONS Ricoh v. Aeroflex C03-04669 MJJ (EMC)

1 Admit that generic operators are not "architecture independent... conditions" as set forth in Claim 13
2 of U.S. Patent No. 4,922,432.

3 RESPONSE:

4 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms "generic
5 operators are not "architecture independent... conditions" as set forth in Claim 13 of U.S. Patent No.
6 4,922,432" as being vague and ambiguous as to what the defendants may mean by the terms. Ricoh
7 further objects that this request is overbroad because it purports to address many different forms of
8 generic operators, and cannot be answered in a single response. Without waiving these objections,
9 Ricoh incorporates by reference its Final Infringement Contentions filed March 24, 2006 and any
10 supplemental contentions and expert reports and testimony. Except as specifically admitted therein,
11 Ricoh denies the Request.

12 REQUEST FOR ADMISSION NO. 34:

13 Admit that "if statements are not "architecture independent... actions" as set forth in Claim 13 of U.S.
14 Patent No. 4,922,432.

15 RESPONSE:

16 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms "if statements are
17 not "architecture independent... actions" as set forth in Claim 13 of U.S. Patent No. 4,922,432" as
18 being vague and ambiguous as to what the defendants may mean by the terms. Ricoh further objects
19 that this request is overbroad because it purports to address many different forms of if statements, and
20 cannot be answered in a single response. Without waiving these objections, Ricoh incorporates by
21 reference its Final Infringement Contentions filed March 24, 2006 and any supplemental contentions
22 and expert reports and testimony. Except as specifically admitted therein, Ricoh denies the Request.

23 REQUEST FOR ADMISSION NO. 35:

24 Admit that "case" statements are not "architecture independent actions" as set forth in Claim 13 of
25 U.S. Patent No. 4,922,432.

26 RESPONSE:

27

28 RICOH'S SUPPLEMENTAL RESPONSE TO ASIC DEFENDANTS' REQUESTS FOR ADMISSIONS Ricoh v. Aeroflex C03-04669 MJJ (EMC)

1 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms ““case”
2 statements are not “architecture independent actions” as set forth in Claim 13 of U.S. Patent No.
3 4,922,432” as being vague and ambiguous as to what the defendants may mean by the terms. Ricoh
4 further objects that this request is overbroad because it purports to address many different forms of
5 case statements, and cannot be answered in a single response. Without waiving these objections,
6 Ricoh incorporates by reference its Final Infringement Contentions filed March 24, 2006 and any
7 supplemental contentions and expert reports and testimony. Except as specifically admitted therein,
8 Ricoh denies the Request.

9 REQUEST FOR ADMISSION NO. 36:

10 Admit that “wait” statements are not “architecture independent actions” as set forth in Claim 13 of
11 U.S. Patent No. 4,922,432,

12 RESPONSE:

13 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms ““wait”
14 statements are not “architecture independent actions” as set forth in Claim 13 of U.S. Patent No.
15 4,922,432” as being vague and ambiguous as to what the defendants may mean by the terms. Ricoh
16 further objects that this request is overbroad because it purports to address many different forms of
17 wait statements, and cannot be answered in a single response. Without waiving these objections,
18 Ricoh incorporates by reference its Final Infringement Contentions filed March 24, 2006 and any
19 supplemental contentions and expert reports and testimony. Except as specifically admitted therein,
20 Ricoh denies the Request.

21 REQUEST FOR ADMISSION NO. 37:

22 Admit that “always” statements are not “architecture independent.. . conditions” as set forth in Claim
23 13 Of U.S., Patent No. 4,922,432.

24 RESPONSE:

25 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms ““always”
26 statements are not “architecture independent.. . conditions” as set forth in Claim 13 Of U.S., Patent No.
27 4,922,432” as being vague and ambiguous as to what the defendants may mean by the terms. Ricoh

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1 further objects that this request is overbroad because it purports to address many different forms of
2 always statements, and cannot be answered in a single response. Without waiving these objections,
3 Ricoh incorporates by reference its Final Infringement Contentions filed March 24, 2006 and any
4 supplemental contentions and expert reports and testimony. Except as specifically admitted therein,
5 Ricoh denies the Request.

6 REQUEST FOR ADMISSION NO. 38:

7 Admit that finite state machines are not "architecture independent actions" as set forth in Claim 13 of
8 U.S. Patent No. 4,922,432.

9 RESPONSE:

10 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms "finite state
11 machines are not "architecture independent actions" as set forth in Claim 13 of U.S. Patent No.
12 4,922,432" as being vague and ambiguous as to what the defendants may mean by the terms. Ricoh
13 further objects that this request is overbroad because it purports to address many different forms of
14 finite state machines, and cannot be answered in a single response. Without waiving these objections,
15 Ricoh incorporates by reference its Final Infringement Contentions filed March 24, 2006 and any
16 supplemental contentions and expert reports and testimony. Except as specifically admitted therein,
17 Ricoh denies the Request.

18 REQUEST FOR ADMISSION NO. 39:

19 Admit that finite state machines are not "architecture independent. . . conditions" as set forth in
20 Claim 13 of U.S. Patent No. 4,922,432.

21 RESPONSE:

22 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms "finite state
23 machines are not "architecture independent. . . conditions" as set forth in Claim 13 of U.S. Patent No.
24 4,922,432" as being vague and ambiguous as to what the defendants may mean by the terms. Ricoh
25 further objects that this request is overbroad because it purports to address many different forms of
26 finite state machines, and cannot be answered in a single response. Without waiving these objections,
27 Ricoh incorporates by reference its Final Infringement Contentions filed March 24, 2006 and any

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1 supplemental contentions and expert reports and testimony. Except as specifically admitted therein,
2 Ricoh denies the Request.

3 REQUEST FOR ADMISSION NO. 40:

4 Admit that HDL arithmetic operators are not "definitions of architecture independent actions"
5 as set forth in Claim 13 of U.S. Patent No. 4,922,432.

6 RESPONSE:

7 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms "HDL arithmetic
8 operators are not "definitions of architecture independent actions" as set forth in Claim 13 of U.S.
9 Patent No. 4,922,432" as being vague and ambiguous as to what the defendants may mean by the
10 terms. Ricoh further objects that this request is overbroad because it purports to address many
11 different forms of HDL arithmetic operators, and cannot be answered in a single response. Without
12 waiving these objections, Ricoh incorporates by reference its Final Infringement Contentions filed
13 March 24, 2006 and any supplemental contentions and expert reports and testimony. Subject to the
14 foregoing objections, as Ricoh has defined the relevant terms in its Final Infringement Contentions,
15 Ricoh admits the Request.

16 REQUEST FOR ADMISSION NO. 41:

17 Admit that HDL arithmetic operators are not "architecture independent, . . . conditions" as set forth in
18 Claim 13 of U.S. Patent No, 4,922,432,

19 RESPONSE:

20 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms "HDL arithmetic
21 operators are not "architecture independent, . . . conditions" as set forth in Claim 13 of U.S. Patent No,
22 4,922,432" as being vague and ambiguous as to what the defendants may mean by the terms. Ricoh
23 further objects that this request is overbroad because it purports to address many different forms of
24 HDL arithmetic operators, and cannot be answered in a single response. Without waiving these
25 objections, Ricoh incorporates by reference its Final Infringement Contentions filed March 24, 2006
26 and any supplemental contentions and expert reports and testimony. Except as specifically admitted
27 therein, Ricoh denies the Request.

1 REQUEST FOR ADMISSION NO. 42:

2 Admit that synthetic operators are not "definitions of architecture independent.. . conditions" as set
3 forth in Claim 13 of U.S. Patent No. 4,922,432.

4 RESPONSE:

5 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms "synthetic
6 operators are not "definitions of architecture independent.. . conditions" as set forth in Claim 13 of U.S.
7 Patent No. 4,922,432" as being vague and ambiguous as to what the defendants may mean by the
8 terms. Ricoh further objects that this request is overbroad because it purports to address many
9 different forms of synthetic operators, and cannot be answered in a single response. Without waiving
10 these objections, Ricoh incorporates by reference its Final Infringement Contentions filed March 24,
11 2006 and any supplemental contentions and expert reports and testimony. Except as specifically
12 admitted therein, Ricoh denies the Request.

13 REQUEST FOR ADMISSION NO. 43:

14 Admit that synthetic modules are not "definitions of architecture independent.. . conditions" as set
15 forth in Claim 13 of U.S. Patent No. 4,922,432.

16 RESPONSE:

17 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms "synthetic
18 modules are not "definitions of architecture independent.. . conditions" as set forth in Claim 13 of U.S.
19 Patent No. 4,922,432" as being vague and ambiguous as to what the defendants may mean by the
20 terms. Ricoh further objects that this request is overbroad because it purports to address many
21 different forms of synthetic operators, and cannot be answered in a single response. Without waiving
22 these objections, Ricoh incorporates by reference its Final Infringement Contentions filed March 24,
23 2006 and any supplemental contentions and expert reports and testimony. Except as specifically
24 admitted therein, Ricoh denies the Request.

25 REQUEST FOR ADMISSION NO. 44:

26 Admit that generic operators are not "definitions of architecture independent actions" as set
27 forth in Claim 13 of U.S. Patent No. 4,922,432.

1 RESPONSE:

2 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms "generic
 3 operators are not "definitions of architecture independent actions" as set forth in Claim 13 of U.S.
 4 Patent No. 4,922,432" as being vague and ambiguous as to what the defendants may mean by the
 5 terms. Ricoh further objects that this request is overbroad because it purports to address many
 6 different forms of generic operators, and cannot be answered in a single response. Without waiving
 7 these objections, Ricoh incorporates by reference its Final Infringement Contentions filed March 24,
 8 2006 and any supplemental contentions and expert reports and testimony. Except as specifically
 9 admitted therein, Ricoh denies the Request.

10 REQUEST FOR ADMISSION NO. 45:

11 Admit that generic operators are not "definitions of architecture independent... conditions" as set
 12 forth in Claim 13 of U.S. Patent No. 4,922,432.

13 RESPONSE:

14 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms "generic
 15 operators are not "definitions of architecture independent... conditions" as set forth in Claim 13 of U.S.
 16 Patent No. 4,922,432" as being vague and ambiguous as to what the defendants may mean by the
 17 terms. Ricoh further objects that this request is overbroad because it purports to address many
 18 different forms of generic operators, and cannot be answered in a single response. Without waiving
 19 these objections, Ricoh incorporates by reference its Final Infringement Contentions filed March 24,
 20 2006 and any supplemental contentions and expert reports and testimony. Except as specifically
 21 admitted therein, Ricoh denies the Request.

22 REQUEST FOR ADMISSION NO. 46:

23 Admit that an "if" statement is not a "definition of an architecture independent action" as set forth in
 24 Claim 13 of U.S. Patent No. 4,922,432.

25 RESPONSE:

26 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms "'if' statement is
 27 not a "definition of an architecture independent action" as set forth in Claim 13 of U.S. Patent No.

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1 4,922,432" as being vague and ambiguous as to what the defendants may mean by the terms. Ricoh
2 further objects that this request is overbroad because it purports to address many different forms of if
3 statements, and cannot be answered in a single response. Without waiving these objections, Ricoh
4 incorporates by reference its Final Infringement Contentions filed March 24, 2006 and any
5 supplemental contentions and expert reports and testimony. Subject to the foregoing objections, as
6 Ricoh has defined the relevant terms in its Final Infringement Contentions, Ricoh admits the Request.

7 REQUEST FOR ADMISSION NO. 47:

8 Admit that a "case" statement is not a "definition of an architecture independent action" as set forth
9 in Claim 13 of U.S. Patent No. 4,922,432.

10 RESPONSE:

11 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms "a "case"
12 statement is not a "definition of an architecture independent action" as set forth in Claim 13 of U.S.
13 Patent No. 4,922,432." as being vague and ambiguous as to what the defendants may mean by the
14 terms. Ricoh further objects that this request is overbroad because it purports to address many
15 different forms of case statements, and cannot be answered in a single response. Without waiving
16 these objections, Ricoh incorporates by reference its Final Infringement Contentions filed March 24,
17 2006 and any supplemental contentions and expert reports and testimony. Subject to the foregoing
18 objections, as Ricoh has defined the relevant terms in its Final Infringement Contentions, Ricoh admits
19 the Request.

20 REQUEST FOR ADMISSION NO. 48:

21 Admit that "wait" statements are not "definitions of architecture independent actions" as set forth in
22 Claim 13 of U.S. Patent No. 4,922,432.

23 RESPONSE:

24 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms ""wait"
25 statements are not "definitions of architecture independent actions" as set forth in Claim 13 of U.S.
26 Patent No. 4,922,432" as being vague and ambiguous as to what the defendants may mean by the
27 terms. Ricoh further objects that this request is overbroad because it purports to address many

1 different forms of wait statements, and cannot be answered in a single response. Without waiving
 2 these objections, Ricoh incorporates by reference its Final Infringement Contentions filed March 24,
 3 2006 and any supplemental contentions and expert reports and testimony. Subject to the foregoing
 4 objections, as Ricoh has defined the relevant terms in its Final Infringement Contentions, Ricoh admits
 5 the Request.

6 REQUEST FOR ADMISSION NO. 49:

7 Admit that "always" statements are not "definitions of architecture independent.. . conditions" as set
 8 forth in Claim 13 of U.S. Patent No. 4,922,432.

9 RESPONSE:

10 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms ""always"
 11 statements are not "definitions of architecture independent.. . conditions" as set forth in Claim 13 of
 12 U.S. Patent No. 4,922,432" as being vague and ambiguous as to what the defendants may mean by the
 13 terms. Ricoh further objects that this request is overbroad because it purports to address many
 14 different forms of always statements, and cannot be answered in a single response. Without waiving
 15 these objections, Ricoh incorporates by reference its Final Infringement Contentions filed March 24,
 16 2006 and any supplemental contentions and expert reports and testimony. Subject to the foregoing
 17 objections, as Ricoh has defined the relevant terms in its Final Infringement Contentions, Ricoh admits
 18 the Request.

19 REQUEST FOR ADMISSION NO. 50:

20 Admit that arithmetic operators are not stored in "a library of definitions of the different architecture
 21 independent actions and conditions that can be selected for use in the desired ASICC," as shown on
 22 page 13 of the Court's claim construction.

23 RESPONSE:

24 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms "arithmetic
 25 operators are not stored in "a library of definitions of the different architecture independent actions and
 26 conditions that can be selected for use in the desired ASIC," as shown on page 13 of the Court's claim
 27 construction" as being vague and ambiguous as to what the defendants may mean by the terms. Ricoh

1 further objects that this request is overbroad because it purports to address many different forms of
 2 arithmetic operators, and cannot be answered in a single response. Without waiving these objections,
 3 Ricoh incorporates by reference its Final Infringement Contentions filed March 24, 2006 and any
 4 supplemental contentions and expert reports and testimony. Except as specifically admitted therein,
 5 Ricoh denies the Request.

6 REQUEST FOR ADMISSION NO. 51:

7 Admit that synthetic operators, such as ADD_UNS_OP, as stored in synthetic libraries, do not
 8 constitute "a library of definitions of the different architecture independent actions and conditions that
 9 can be selected for use in the desired ASIC," as shown on page 13 of the Court's claim construction.

10 RESPONSE:

11 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms "synthetic
 12 operators, such as ADD_UNS_OP, as stored in synthetic libraries, do not constitute "a library of
 13 definitions of the different architecture independent actions and conditions that can be selected for use
 14 in the desired ASIC," as shown on page 13 of the Court's claim construction" as being vague and
 15 ambiguous as to what the defendants may mean by the terms. Ricoh further objects that this request is
 16 overbroad because it purports to address many different forms of synthetic operators, and cannot be
 17 answered in a single response. Without waiving these objections, Ricoh incorporates by reference its
 18 Final Infringement Contentions filed March 24, 2006 and any supplemental contentions and expert
 19 reports and testimony. Except as specifically admitted therein, Ricoh denies the Request.

20 REQUEST FOR ADMISSION NO. 52:

21 Admit that synthetic modules, such as DWO1_ADD, as stored in synthetic libraries, do not constitute
 22 "a library of definitions of the different architecture independent actions and conditions that can be
 23 selected for use in the desired ASIC," as shown on page 13 of the Court's claim construction.

24 RESPONSE:

25 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms "synthetic
 26 modules, such as DWO1_ADD, as stored in synthetic libraries, do not constitute "a library of
 27 definitions of the different architecture independent actions and conditions that can be selected for use

1 in the desired ASIC," as shown on page 13 of the Court's claim construction" as being vague and
 2 ambiguous as to what the defendants may mean by the terms. Ricoh further objects that this request is
 3 overbroad because it purports to address many different forms of synthetic modules, and cannot be
 4 answered in a single response. Without waiving these objections, Ricoh incorporates by reference its
 5 Final Infringement Contentions filed March 24, 2006 and any supplemental contentions and expert
 6 reports and testimony. Except as specifically admitted therein, Ricoh denies the Request.

7 REQUEST FOR ADMISSION NO. 53:

8 Admit that placing generic operators, such as MUXJ3P. SELECT_OP, DP_OP, SEQGEN, FFGEN,
 9 LOGDB, in memory does not constitute storing "a library of definitions of the different architecture
 10 independent actions and conditions that can be selected for use in the desired ASIC," as shown on page
 11 13 of the Court's claim construction.

12 RESPONSE:

13 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms "placing generic
 14 operators, such as MUXJ3P. SELECT_OP, DP_OP, SEQGEN, FFGEN, LOGDB, in memory does not
 15 constitute storing "a library of definitions of the different architecture independent actions and
 16 conditions that can be selected for use in the desired ASIC," as shown on page 13 of the Court's claim
 17 construction" as being vague and ambiguous as to what the defendants may mean by the terms. Ricoh
 18 further objects that this request is overbroad because it purports to address many different forms of
 19 generic operators, and cannot be answered in a single response. Without waiving these objections,
 20 Ricoh incorporates by reference its Final Infringement Contentions filed March 24, 2006 and any
 21 supplemental contentions and expert reports and testimony. Except as specifically admitted therein,
 22 Ricoh denies the Request.

23 REQUEST FOR ADMISSION NO. 54:

24 Admit that creating an implementation table in computer memory does not constitute storing "a
 25 library of definitions of the different architecture independent actions and conditions that can be
 26 selected for use in the desired ASIC," as shown on page 13 of the Court's claim construction.

27 RESPONSE:

28 RICOH'S SUPPLEMENTAL RESPONSE TO ASIC DEFENDANTS' REQUESTS FOR ADMISSIONS Ricoh v. Aeroflex C03-04669 MJJ (EMC)

1 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms "creating an
 2 implementation table in computer memory does not constitute storing "a library of definitions of the
 3 different architecture independent actions and conditions that can be selected for use in the desired
 4 ASIC," as shown on page 13 of the Court's claim construction" as being vague and ambiguous as to
 5 what the defendants may mean by the terms. Without waiving these objections, Ricoh incorporates by
 6 reference its Final Infringement Contentions filed March 24, 2006 and any supplemental contentions
 7 and expert reports and testimony. Except as specifically admitted therein, Ricoh denies the Request.

8 REQUEST FOR ADMISSION NO. 55:

9 Admit that in V-2003.12-SP1, actions and conditions are never stored together in "a library of
 10 definitions of the different architecture independent actions and conditions that can be selected for use
 11 in the desired ASIC," as shown on page 13 of the Court's claim construction,

12 RESPONSE:

13 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms "in V-2003.12-
 14 SP1, actions and conditions are never stored together in "a library of definitions of the different
 15 architecture independent actions and conditions that can be selected for use in the desired ASIC," as
 16 shown on page 13 of the Court's claim construction" as being vague and ambiguous as to what the
 17 defendants may mean by the terms. Ricoh further objects because Synopsys never provided a
 18 competent witness on the V-2003.12-SP1 source code. For at least these reasons, Ricoh cannot
 19 answer this Request, and therefore denies same.

20 REQUEST FOR ADMISSION NO. 56:

21 Admit that the "library of definitions of the different architecture independent actions and conditions
 22 that can be selected for use in the desired ASIC" identified in Ricoh's Final Infringement Contentions
 23 does not exist in its entirety prior to a design being read into the Design Compiler System.

24 RESPONSE:

25 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms "the "library of
 26 definitions of the different architecture independent actions and conditions that can be selected for use
 27 in the desired ASIC" identified in Ricoh's Final Infringement Contentions does not exist in its entirety

1 prior to a design being read into the Design Compiler System" as being vague and ambiguous as to
2 what the defendants may mean by the terms. Without waiving these objections, Ricoh incorporates by
3 reference its Final Infringement Contentions filed March 24, 2006 and any supplemental contentions
4 and expert reports and testimony. Except as specifically admitted therein, Ricoh denies the Request.

5 REQUEST FOR ADMISSION NO. 57:

6 Admit that both actions and conditions must be contained in a single library to constitute "a library of
7 definitions of the different architecture independent actions and conditions that can be selected for use
8 in the desired ASIC," as shown on page 13 of the Court's claim construction,

9 RESPONSE:

10 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms "both actions and
11 conditions must be contained in a single library to constitute "a library of definitions of the different
12 architecture independent actions and conditions that can be selected for use in the desired ASIC," as
13 shown on page 13 of the Court's claim construction" as being vague and ambiguous as to what the
14 defendants may mean by the terms. Without waiving these objections, Ricoh incorporates by reference
15 its Final Infringement Contentions filed March 24, 2006 and any supplemental contentions and expert
16 reports and testimony. Except as specifically admitted therein, Ricoh denies the Request.

17 REQUEST FOR ADMISSION NO. 58:

18 Admit that the implementation table, in any version of the Synopsys products-in-suit, is created only
19 after a design is read into the Design Compiler System.

20 RESPONSE:

21 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms "the
22 implementation table, in any version of the Synopsys products-in-suit, is created only after a design is
23 read into the Design Compiler System" as being vague and ambiguous as to what the defendants may
24 mean by the terms. For at least those reasons, Ricoh denies the Request.

25 REQUEST FOR ADMISSION NO. 59:

26 Admit that the generic operators, in any version of the Synopsys products-in-suit, are loaded into
27 memory only when the Design Compiler System is executed.

1 RESPONSE:

2 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms "the generic
 3 operators, in any version of the Synopsys products-in-suit, are loaded into memory only when the
 4 Design Compiler System is executed" as being vague and ambiguous as to what the defendants may
 5 mean by the terms. Ricoh further objects that this request is overbroad because it purports to address
 6 many different forms of generic operators, and cannot be answered in a single response. For at least
 7 those reasons, Ricoh denies the Request.

8 REQUEST FOR ADMISSION NO. 60:

9 Admit that in Claim 13 of U.S. Patent 4,922,432 "a set of definitions of architecture independent
 10 actions and conditions" must be stored prior to "describing for a proposed application specific
 11 integrated circuit a series of architecture independent actions and conditions."

12 RESPONSE:

13 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms "in Claim 13 of
 14 U.S. Patent 4,922,432 "a set of definitions of architecture independent actions and conditions" must be
 15 stored prior to "describing for a proposed application specific integrated circuit a series of architecture
 16 independent actions and conditions"" as being vague and ambiguous as to what the defendants may
 17 mean by the terms. Additionally, Ricoh objects to the extent that this request seeks a legal opinion.
 18 Without waiving these objections, Ricoh incorporates by reference its Final Infringement Contentions
 19 filed March 24, 2006 and any supplemental contentions and expert reports and testimony. Except as
 20 specifically admitted therein, Ricoh denies the Request.

21 REQUEST FOR ADMISSION NO. 61:

22 Admit that in Claim 13 of U.S. Patent 4,922,432 "a set of definitions of architecture independent
 23 actions and conditions" must be stored prior to "specifying for each described action and condition of
 24 the series one of said stored definitions which corresponds to the desired action or condition to be
 25 performed."

26 RESPONSE:

27
 28 RICOH'S SUPPLEMENTAL RESPONSE TO ASIC DEFENDANTS' REQUESTS FOR ADMISSIONS Ricoh v. Aeroflex C03-04669 MJJ (EMC)

1 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms "in Claim 13 of
 2 U.S. Patent 4,922,432 "a set of definitions of architecture independent actions and conditions" must be
 3 stored prior to "specifying for each described action and condition of the series one of said stored
 4 definitions which corresponds to the desired action or condition to be performed."'" as being vague and
 5 ambiguous as to what the defendants may mean by the terms. Without waiving these objections, Ricoh
 6 incorporates by reference its Final Infringement Contentions filed March 24, 2006 and any
 7 supplemental contentions and expert reports and testimony. Except as specifically admitted therein,
 8 Ricoh denies the Request.

9 REQUEST FOR ADMISSION NO. 62:

10 Admit that in Claim 13 of U.S. Patent 4,922,432 the "a set of definitions of architecture independent
 11 actions and conditions" must be stored prior to "selecting from said stored data for each of the
 12 specified definitions a corresponding integrated circuit hardware cell comprising applying to the
 13 specified definition of the action or condition to be performed, a set of cell selection rules stored in
 14 said expert system knowledge base."

15 RESPONSE:

16 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms "in Claim 13 of
 17 U.S. Patent 4,922,432 the "a set of definitions of architecture independent actions and conditions" must
 18 be stored prior to "selecting from said stored data for each of the specified definitions a corresponding
 19 integrated circuit hardware cell comprising applying to the specified definition of the action or
 20 condition to be performed, a set of cell selection rules stored in said expert system knowledge base" as
 21 being vague and ambiguous as to what the defendants may mean by the terms. Without waiving these
 22 objections, Ricoh incorporates by reference its Final Infringement Contentions filed March 24, 2006
 23 and any supplemental contentions and expert reports and testimony. Except as specifically admitted
 24 therein, Ricoh denies the Request.

25 REQUEST FOR ADMISSION NO. 63:

26 Admit that a "rule," as described in claim 13 of U.S. Patent No. 4,922,432 must include both an
 27 antecedent portion and a consequent portion.

1 RESPONSE:

2 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms "a "rule," as
 3 described in claim 13 of U.S. Patent No. 4,922,432 must include both an antecedent portion and a
 4 consequent portion" as being vague and ambiguous as to what the defendants may mean by the terms.
 5 Without waiving these objections, Ricoh incorporates by reference its Final Infringement Contentions
 6 filed March 24, 2006 and any supplemental contentions and expert reports and testimony. Except as
 7 specifically admitted therein, Ricoh denies the Request.

8 REQUEST FOR ADMISSION NO. 64:

9 Admit that you claim that any IF-THEN statement is "rule" as defined in the Court's April 7, 2006
 10 Claim Construction Order.

11 RESPONSE:

12 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms "IF-THEN
 13 statement is "rule"" as being vague and ambiguous as to what the defendants may mean by the terms.
 14 For at least those reasons, Ricoh denies the Request.

15 REQUEST FOR ADMISSION NO. 65:

16 Admit that if the consequent portion of one or more rules is not applied to a design during logic
 17 synthesis, then there has been "selective application" of the rules.

18 RESPONSE:

19 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms "if the
 20 consequent portion of one or more rules is not applied to a design during logic synthesis, then there
 21 has been "selective application" of the rules" as being vague and ambiguous as to what the defendants
 22 may mean by the terms. Ricoh further objects that this request is overbroad because it purports to
 23 address many different forms of rules, and cannot be answered in a single response. For at least those
 24 reasons, Ricoh denies the Request.

25 REQUEST FOR ADMISSION NO. 66:

26 Admit that if the "THEN" portion of one or more rules is not applied to a design during logic
 27 synthesis, then there has been "selective application" of the rules.

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1 RESPONSE:

2 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms "if the "THEN"
3 portion of one or more rules is not applied to a design during logic synthesis, then there has been
4 "selective application" of the rules" as being vague and ambiguous as to what the defendants may
5 mean by the terms. For at least those reasons, Ricoh denies the Request.

6 REQUEST FOR ADMISSION NO. 67:

7 Admit that if the antecedent portions of every rule in an expert system knowledge base is tested
8 during logic synthesis of an ASIC design, then there is not "selective application" of the rules.

9 RESPONSE:

10 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms "if the antecedent
11 portions of every rule in an expert system knowledge base is tested during logic synthesis of an ASIC
12 design, then there is not "selective application" of the rules" as being vague and ambiguous as to what
13 the defendants may mean by the terms. For at least those reasons, Ricoh denies the Request.

14 REQUEST FOR ADMISSION NO. 68:

15 Admit that the antecedent portion of every "SOT trick" is tested or "tried" during logic synthesis of
16 an ASIC design.

17 RESPONSE:

18 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms "the antecedent
19 portion of every "SOT trick" is tested or "tried" during logic synthesis of an ASIC design" as being
20 vague and ambiguous as to what the defendants may mean by the terms. For at least those reasons,
21 Ricoh denies the Request.

22 REQUEST FOR ADMISSION NO. 69:

23 Admit that the antecedent portion of every "SDN trick" is tested or "tried" during logic synthesis of
24 an ASIC design.

25 RESPONSE:

26 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms "the antecedent
27 portion of every "SDN trick" is tested or "tried" during logic synthesis of an ASIC design" as being

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1 vague and ambiguous as to what the defendants may mean by the terms. For at least those reasons,
2 Ricoh denies the Request.

3 REQUEST FOR ADMISSION NO. 70:

4 Admit that every "SOT trick" and "SDN trick" is attempted during logic synthesis of an ASIC
5 design,

6 RESPONSE:

7 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms "'SOT trick'" and
8 "'SDN trick'" is attempted during logic synthesis of an ASIC design" as being vague and ambiguous as
9 to what the defendants may mean by the terms. For at least those reasons, Ricoh denies the Request.

10 REQUEST FOR ADMISSION NO. 71:

11 Admit that if the "IF" condition of every SOT trick is tested during logic synthesis, then the SOT
12 tricks are not selectively applied.

13 RESPONSE:

14 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms "if the "IF"
15 condition of every SOT trick is tested during logic synthesis, then the SOT tricks are not selectively
16 applied" as being vague and ambiguous as to what the defendants may mean by the terms. For at least
17 those reasons, Ricoh denies the Request.

18 REQUEST FOR ADMISSION NO. 72:

19 Admit that if the "IF" condition of every SDN trick is tested during logic synthesis, then the SDN
20 tricks are not selectively applied.

21 RESPONSE:

22 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms "if the "IF"
23 condition of every SDN trick is tested during logic synthesis, then the SDN tricks are not selectively
24 applied" as being vague and ambiguous as to what the defendants may mean by the terms. For at least
25 those reasons, Ricoh denies the Request.

26 REQUEST FOR ADMISSION NO. 73:

27

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1 Admit that if the "IF" condition of every SOT and SDN trick is tested during logic synthesis, then the
 2 SOT and SDN tricks are not selectively applied.

3 RESPONSE:

4 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms "if the "IF"
 5 condition of every SOT and SDN trick is tested during logic synthesis, then the SOT and SDN tricks
 6 are not selectively applied" as being vague and ambiguous as to what the defendants may mean by the
 7 terms. For at least those reasons, Ricoh denies the Request.

8 REQUEST FOR ADMISSION NO. 74:

9 Admit that Ricoh claims that the "expert knowledge of highly skilled VLSI designers," as shown on
 10 page 17 of the claim construction order, embodied in the Design Compiler System originated the
 11 Socrates system.

12 RESPONSE:

13 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms "the "expert
 14 knowledge of highly skilled VLSI designers," as shown on page 17 of the claim construction order,
 15 embodied in the Design Compiler System originated the Socrates system" as being vague and
 16 ambiguous as to what the defendants may mean by the terms. Without waiving these objections, Ricoh
 17 incorporates by reference its Final Infringement Contentions filed March 24, 2006 and any
 18 supplemental contentions and expert reports and testimony. Except as specifically admitted therein,
 19 Ricoh denies the Request.

20 REQUEST FOR ADMISSION NO. 75:

21 Admit that the Socrates system predicated the filing of the patent application that became U.S. Patent
 22 No. 4, 922, 432.

23 RESPONSE:

24 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms "the Socrates
 25 system predicated" as being vague and ambiguous as to what the defendants may mean by the terms.
 26 For at least those reasons, Ricoh denies the Request.

27 REQUEST FOR ADMISSION NO. 76:

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1 Admit that Ricoh cannot identify any "rules" in the Socrates system that continue to be used in the

2 Design Compiler System,

3 RESPONSE:

4 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms "identify any
 5 "rules" in the Socrates system that continue to be used in the Design Compiler System" as being vague
 6 and ambiguous as to what the defendants may mean by the terms. For at least those reasons, Ricoh
 7 denies the Request.

8 REQUEST FOR ADMISSION NO. 77:

9 Admit that if "architecture independent actions and conditions" are explicitly included in the input
 10 specification for the design of an ASIC, they are not "described," as that term is defined on page
 11 13 of the claim construction order.

12 RESPONSE:

13 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms ""architecture
 14 independent actions and conditions" are explicitly included in the input specification for the design of
 15 an ASIC, they are not "described,"" as being vague and ambiguous as to what the defendants may
 16 mean by the terms. Without waiving these objections, Ricoh incorporates by reference its Final
 17 Infringement Contentions filed March 24, 2006 and any supplemental contentions and expert reports
 18 and testimony. Except as specifically admitted therein, Ricoh denies the Request.

19 REQUEST FOR ADMISSION NO. 78:

20 Admit that if arithmetic operators are explicitly included in the input specification for the design of
 21 an ASIC, they are not "described," as that term is defined on page 13 of the claim construction order.

22 RESPONSE:

23 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms "arithmetic
 24 operators are explicitly included in the input specification for the design of an ASIC, they are not
 25 "described,"" as being vague and ambiguous as to what the defendants may mean by the terms. Ricoh
 26 further objects that this request is overbroad because it purports to address many different forms of
 27 arithmetic operators, and cannot be answered in a single response. Without waiving these objections,

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1 Ricoh incorporates by reference its Final Infringement Contentions filed March 24, 2006 and any
 2 supplemental contentions and expert reports and testimony. Except as specifically admitted therein,
 3 Ricoh denies the Request.

4 REQUEST FOR ADMISSION NO. 79:

5 Admit that if "if" statements are explicitly included in the input specification for the design of an
 6 ASIC, they are not "described," as that term is defined in the Court's April 7, 2005 Claim Construction
 7 Order.

8 RESPONSE:

9 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms ""if" statements
 10 are explicitly included in the input specification for the design of an ASIC, they are not "described,""
 11 as being vague and ambiguous as to what the defendants may mean by the terms. Ricoh further
 12 objects that this request is overbroad because it purports to address many different forms of if
 13 statements, and cannot be answered in a single response. Without waiving these objections, Ricoh
 14 incorporates by reference its Final Infringement Contentions filed March 24, 2006 and any
 15 supplemental contentions and expert reports and testimony. Except as specifically admitted therein,
 16 Ricoh denies the Request.

17 REQUEST FOR ADMISSION NO. 80:

18 Admit that if "case" statements are explicitly included in the input specification for the design of an
 19 ASIC, they are not "described," as that term is defined in the Court's April 7, 2005 Claim Construction
 20 Order.

21 RESPONSE:

22 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms ""case"
 23 statements are explicitly included in the input specification for the design of an ASIC, they are not
 24 "described,"" as being vague and ambiguous as to what the defendants may mean by the terms. Ricoh
 25 further objects that this request is overbroad because it purports to address many different forms of
 26 case statements, and cannot be answered in a single response. Without waiving these objections,
 27 Ricoh incorporates by reference its Final Infringement Contentions filed March 24, 2006 and any

1 supplemental contentions and expert reports and testimony. Except as specifically admitted therein,
2 Ricoh denies the Request.

3 REQUEST FOR ADMISSION NO. 81:

4 Admit that if "wait" statements are explicitly included in the input specification for the design of an
5 ASIC, they are not "described," as that term is defined in the Court's April 7, 2005 Claim Construction
6 Order.

7 RESPONSE:

8 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms "if "wait"
9 statements are explicitly included in the input specification for the design of an ASIC, they are not
10 "described,"" as being vague and ambiguous as to what the defendants may mean by the terms. Ricoh
11 further objects that this request is overbroad because it purports to address many different forms of
12 wait statements, and cannot be answered in a single response. Without waiving these objections,
13 Ricoh incorporates by reference its Final Infringement Contentions filed March 24, 2006 and any
14 supplemental contentions and expert reports and testimony. Except as specifically admitted therein,
15 Ricoh denies the Request.

16 REQUEST FOR ADMISSION NO. 82:

17 Admit that if "always" statements are explicitly included in the input specification for the design of an
18 ASIC, they are not "described," as that term is defined in the Court's April 7, 2005 Claim
19 Construction Order.

20 RESPONSE:

21 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms "if "always"
22 statements are explicitly included in the input specification for the design of an ASIC, they are not
23 "described,"" as being vague and ambiguous as to what the defendants may mean by the terms. Ricoh
24 further objects that this request is overbroad because it purports to address many different forms of
25 always statements, and cannot be answered in a single response. Without waiving these objections,
26 Ricoh incorporates by reference its Final Infringement Contentions filed March 24, 2006 and any
27

1 supplemental contentions and expert reports and testimony. Except as specifically admitted therein,
 2 Ricoh denies the Request.

3 REQUEST FOR ADMISSION NO. 83:

4 Admit that the HDL Compilers commands "analyze" and "elaborate" must be used to satisfy the step
 5 of "specifying for each described action and condition of the series one of said stored definitions which
 6 corresponds to the desired action or condition to be performed" of Claim 13 of U.S. Patent No.

7 4,922,432.

8 RESPONSE:

9 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms "HDL Compilers
 10 commands "analyze" and "elaborate" must be used to satisfy the step of "specifying for each described
 11 action and condition of the series one of said stored definitions which corresponds to the desired action
 12 or condition to be performed" of Claim 13 of U.S. Patent No. 4,922,432" as being vague and
 13 ambiguous as to what the defendants may mean by the terms. Ricoh further objects that this request is
 14 overbroad because it purports to address several commands, and cannot be answered in a single
 15 response. Without waiving these objections, Ricoh incorporates by reference its Final Infringement
 16 Contentions filed March 24, 2006 and any supplemental contentions and expert reports and testimony.
 17 Except as specifically admitted therein, Ricoh denies the Request.

18 REQUEST FOR ADMISSION NO. 84:

19 Admit that neither "SOT tricks" nor "SDN tricks" in the V-2003.12-SP1 version of Design Compiler
 20 are applied to arithmetic operators.

21 RESPONSE:

22 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms ""SOT tricks" nor
 23 "SDN tricks" in the V-2003.12-SP1 version of Design Compiler are applied to arithmetic operators" as
 24 being vague and ambiguous as to what the defendants may mean by the terms. Ricoh further objects
 25 that this request is overbroad because it purports to address many different forms of arithmetic
 26 operators, and cannot be answered in a single response. Ricoh further objects because Synopsys never
 27

1 provided a competent witness on the V-2003.12-SP1 source code. For at least these reasons, Ricoh
 2 cannot answer this Request..

3 REQUEST FOR ADMISSION NO. 85:

4 Admit that neither "SOT tricks" nor "SDN tricks" in the V-2003.12-SP version of Design Compiler
 5 are applied to synthetic operators.

6 RESPONSE:

7 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms ""SOT tricks" nor
 8 "SDN tricks" in the V-2003.12-SP version of Design Compiler are applied to synthetic operators" as
 9 being vague and ambiguous as to what the defendants may mean by the terms. Ricoh further objects
 10 that this request is overbroad because it purports to address many different forms of synthetic
 11 operators, and cannot be answered in a single response. Ricoh further objects because Synopsys never
 12 provided a competent witness on the V-2003.12-SP1 source code. For at least these reasons, Ricoh
 13 cannot answer this Request, and therefore denies same.

14 REQUEST FOR ADMISSION NO. 86:

15 Admit that neither "SOT tricks" nor "SON tricks" in the V-2003.12-SP1 version of Design Compiler
 16 are applied to synthetic modules.

17 RESPONSE:

18 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms "neither "SOT
 19 tricks" nor "SON tricks" in the V-2003.12-SP1 version of Design Compiler are applied to synthetic
 20 modules" as being vague and ambiguous as to what the defendants may mean by the terms. Ricoh
 21 further objects that this request is overbroad because it purports to address many different forms of
 22 synthetic modules, and cannot be answered in a single response. Ricoh further objects because
 23 Synopsys never provided a competent witness on the V-2003.12-SP1 source code. For at least these
 24 reasons, Ricoh cannot answer this Request, and therefore denies same.

25 REQUEST FOR ADMISSION NO. 87:

26 Admit that neither "SOT tricks" nor "SDN tricks" in the V-2003.12-SP1 version of Design Compiler
 27 are applied to generic operators.

1 RESPONSE:

2 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms ““SOT tricks” nor
 3 “SDN tricks” in the V-2003.12-SP1 version of Design Compiler are applied to generic operators” as
 4 being vague and ambiguous as to what the defendants may mean by the terms. Ricoh further objects
 5 that this request is overbroad because it purports to address many different forms of generic operators,
 6 and cannot be answered in a single response. Ricoh further objects because Synopsys never provided a
 7 competent witness on the V-2003.12-SP1 source code. For at least these reasons, Ricoh cannot answer
 8 this Request, and therefore denies same.

9 REQUEST FOR ADMISSION NO. 88:

10 Admit that neither “SOT tricks” nor “SDN tricks” in the V-2003.12-SP1 version of Design Compiler
 11 are applied to “if” statements.

12 RESPONSE:

13 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms ““SOT tricks” nor
 14 “SDN tricks” in the V-2003.12-SP1 version of Design Compiler are applied to “if” statements” as
 15 being vague and ambiguous as to what the defendants may mean by the terms. Ricoh further objects
 16 that this request is overbroad because it purports to address many different forms of if statements, and
 17 cannot be answered in a single response. Ricoh further objects because Synopsys never provided a
 18 competent witness on the V-2003.12-SP1 source code. For at least these reasons, Ricoh cannot answer
 19 this Request, and therefore denies same.

20 REQUEST FOR ADMISSION NO. 89:

21 Admit that neither “SOT tricks” nor “SDN tricks” in the V-2003.12-SP1 version of Design Compiler
 22 are applied to “case” statements.

23 RESPONSE:

24 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms ““SOT tricks” nor
 25 “SDN tricks” in the V-2003.12-SP1 version of Design Compiler are applied to “case” statements” as
 26 being vague and ambiguous as to what the defendants may mean by the terms. Ricoh further objects
 27 that this request is overbroad because it purports to address many different forms of case statements,

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1 and cannot be answered in a single response. Ricoh further objects because Synopsys never provided a
2 competent witness on the V-2003.12-SP1 source code. For at least these reasons, Ricoh cannot answer
3 this Request, and therefore denies same.

4 REQUEST FOR ADMISSION NO. 90:

5 Admit that neither "SOT tricks" nor "SDN tricks" in the V-2003.12-SP1 version of Design Compiler
6 are applied to "wait" statements.

7 RESPONSE:

8 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms ""SOT tricks" nor
9 "SDN tricks" in the V-2003.12-SP1 version of Design Compiler are applied to "wait" statements" as
10 being vague and ambiguous as to what the defendants may mean by the terms. Ricoh further objects
11 that this request is overbroad because it purports to address many different forms of wait statements,
12 and cannot be answered in a single response. Ricoh further objects because Synopsys never provided a
13 competent witness on the V-2003.12-SP1 source code. For at least these reasons, Ricoh cannot answer
14 this Request, and therefore denies same.

15 REQUEST FOR ADMISSION NO. 91:

16 Admit that neither "SOT tricks" nor "SDN tricks" in the V-2003.12-SP1 version of Design Compiler
17 are applied to "always" statements.

18 RESPONSE:

19 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms "neither "SOT
20 tricks" nor "SDN tricks" in the V-2003.12-SP1 version of Design Compiler are applied to "always"
21 statements" as being vague and ambiguous as to what the defendants may mean by the terms. Ricoh
22 further objects that this request is overbroad because it purports to address many different forms of
23 always statements, and cannot be answered in a single response. Ricoh further objects because
24 Synopsys never provided a competent witness on the V-2003.12-SP1 source code. For at least these
25 reasons, Ricoh cannot answer this Request, and therefore denies same.

26 REQUEST FOR ADMISSION NO. 92:

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1 Admit that neither "SOT tricks" nor "SDN tricks" in the V-2003.12-SP1 version of Design Compiler
 2 are applied to finite state machines.

3 **RESPONSE:**

4 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms ""SOT tricks" nor
 5 "SDN tricks" in the V-2003.12-SP1 version of Design Compiler are applied to finite state machines" as
 6 being vague and ambiguous as to what the defendants may mean by the terms. Ricoh further objects
 7 that this request is overbroad because it purports to address many different forms of finite state
 8 machines, and cannot be answered in a single response. Ricoh further objects because Synopsys never
 9 provided a competent witness on the V-2003.12-SP1 source code. For at least these reasons, Ricoh
 10 cannot answer this Request, and therefore denies same.

11 **REQUEST FOR ADMISSION NO. 93:**

12 Admit that "SOT tricks" and "SDN tricks" in the V-2003.12-SP1 version of Design Compiler are
 13 only applied to cells that have already been mapped to a technology library.

14 **RESPONSE:**

15 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms ""SOT tricks"
 16 and "SDN tricks" in the V-2003.12-SP1 version of Design Compiler are only applied to cells that have
 17 already been mapped to a technology library" as being vague and ambiguous as to what the defendants
 18 may mean by the terms. Ricoh further objects because Synopsys never provided a competent witness
 19 on the V-2003.12-SP1 source code. For at least these reasons, Ricoh cannot answer this Request, and
 20 therefore denies same.

21 **REQUEST FOR ADMISSION NO. 94:**

22 Admit that neither "SOT tricks" nor "SDN tricks" in the V-2003.12-SP1 version of Design Compiler
 23 are applied to the input HDL description.

24 **RESPONSE:**

25 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms ""SOT tricks" nor
 26 "SDN tricks" in the V-2003.12-SP1 version of Design Compiler are applied to the input HDL
 27 description" as being vague and ambiguous as to what the defendants may mean by the terms. Ricoh

1 further objects because Synopsys never provided a competent witness on the V-2003.12-SPI source
 2 code. For at least these reasons, Ricoh cannot answer this Request, and therefore denies same.

3 REQUEST FOR ADMISSION NO. 95:

4 Admit that a netlist output from Design Compiler must contain all of "the hardware cells which are
 5 needed to perform the desired function of the integrated circuit and the interconnection requirements
 6 therefor" to meet the last element of Claim 13 of U.S. Patent No. 4,922,432.

7 RESPONSE:

8 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms "a netlist output
 9 from Design Compiler must contain all of "the hardware cells which are needed to perform the desired
 10 function of the integrated circuit and the interconnection requirements therefor" to meet the last
 11 element of Claim 13" as being vague and ambiguous as to what the defendants may mean by the terms.
 12 Additionally, Ricoh objects to the extent that this request seeks expert knowledge or expert opinion.
 13 Without waiving these objections, Ricoh incorporates by reference its Final Infringement Contentions
 14 filed March 24, 2006 and any supplemental contentions and expert reports and testimony. Except as
 15 specifically admitted therein, Ricoh denies the Request.

16 REQUEST FOR ADMISSION NO. 96:

17 Admit that netlist output from Design Compiler which does not contain all of "the hardware cells
 18 which are needed to perform the desired function of the integrated circuit and the interconnection
 19 requirements therefor" does not satisfy the last element from claim 13 of U.S. Patent No. 4,922,432.

20 RESPONSE:

21 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms "netlist output
 22 from Design Compiler which does not contain all of "the hardware cells which are needed to perform
 23 the desired function of the integrated circuit and the interconnection requirements therefor" does not
 24 satisfy the last element from claim 13" as being vague and ambiguous as to what the defendants may
 25 mean by the terms. Additionally, Ricoh objects to the extent that this request seeks expert knowledge
 26 or expert opinion. Without waiving these objections, Ricoh incorporates by reference its Final

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1 Infringement Contentions filed March 24, 2006 and any supplemental contentions and expert reports
 2 and testimony. Except as specifically admitted therein, Ricoh denies the Request.

3 REQUEST FOR ADMISSION NO. 97:

4 Admit that the netlist output from Design Compiler for a mixed signal ASIC would only include
 5 hardware cells for the digital portions of the ASIC.

6 RESPONSE:

7 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms “the netlist output
 8 from Design Compiler for a mixed signal ASIC would only include hardware cells for the digital
 9 portions of the ASIC” as being vague and ambiguous as to what the defendants may mean by the
 10 terms. Additionally, Ricoh objects to the extent that this request seeks expert knowledge or expert
 11 opinion. For at least those reasons, Ricoh denies the Request.

12 REQUEST FOR ADMISSION NO. 98:

13 Admit that the netlist output from Design Compiler is changed in the place and route process.

14 RESPONSE:

15 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms “the netlist output
 16 from Design Compiler is changed in the place and route process” as being vague and ambiguous as to
 17 what the defendants may mean by the terms. Additionally, Ricoh objects to the extent that this request
 18 seeks expert knowledge or expert opinion. For at least those reasons, Ricoh denies the Request.

19 REQUEST FOR ADMISSION NO. 99:

20 Admit that the netlist output from Design Compiler is not directly used to generate GDSII files.

21 RESPONSE:

22 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms “the netlist output
 23 from Design Compiler is not directly used to generate GDSII files” as being vague and ambiguous as
 24 to what the defendants may mean by the terms. For at least those reasons, Ricoh denies the Request.

25 REQUEST FOR ADMISSION NO. 100:

26 Admit that the netlist output from the place and route process is directly used to generate GDSII tiles.

27 RESPONSE:

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1 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms "the netlist output
 2 from the place and route process is directly used to generate GDSII tiles" as being vague and
 3 ambiguous as to what the defendants may mean by the terms. Additionally, Ricoh objects to the extent
 4 that this request seeks expert knowledge or expert opinion. For at least those reasons, Ricoh denies the
 5 Request.

6 REQUEST FOR ADMISSION NO. 101:

7 Admit that you do not claim that any Customer Defendant's use of the Design Compiler System is
 8 anything but "ordinary use."

9 RESPONSE:

10 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms "Customer
 11 Defendant's use of the Design Compiler System is anything but "ordinary use"" as being vague and
 12 ambiguous as to what the defendants may mean by the terms. For at least those reasons, Ricoh denies
 13 the Request.

14 REQUEST FOR ADMISSION NO. 102:

15 Admit that Ricoh does not have any basis for claiming that Aeroflex Incorporated makes, uses,
 16 imports, sell, or offers to sell within the United States or exports from the United States ASICS made
 17 by the process recited in claims 13-17 of U.S. Patent No. 4,922,432.

18 RESPONSE:

19 Ricoh incorporates by reference objections 1-15. Otherwise, denied.

20 REQUEST FOR ADMISSION NO. 103:

21 Admit that if a VHDL design containing only the statements "if csy or counter = 63 then counter <= 22 0; else" is input into the V-2003.12-SP1 version of the Synopsys products-in-suit, no output will result.

23 RESPONSE:

24 Ricoh incorporates by reference objections 1-15. Ricoh further objects that this request is a
 25 hypothetical and calls for information not available to Ricoh. Ricoh has not input a VHDL design
 26 containing only the statements "if csy or counter = 63 then counter <= 0; else" into the V-2003.12-SP1
 27 version of the Synopsys products-in-suit. Ricoh further objects because Synopsys never provided a
 28

1 competent witness on the V-2003.12-SP1 source code. For at least these reasons, Ricoh cannot answer
2 this Request, and therefore denies same.

3 REQUEST FOR ADMISSION NO. 104:

4 Admit that if a VHDL design containing only the statements "if csy or counter = 63 then counter <= 0; else" is input into the V-2003.12-SP version of the Synopsys products-in-suit, a syntax error will result.

7 RESPONSE:

8 Ricoh incorporates by reference objections 1-15. Ricoh further objects that this request is a hypothetical and calls for information not available to Ricoh. Ricoh has not input a VHDL design containing only the statements "if csy or counter = 63 then counter <= 0; else" into the V-2003.12-SP1 version of the Synopsys products-in-suit. Ricoh further objects because Synopsys never provided a competent witness on the V-2003.12-SP1 source code. For at least these reasons, Ricoh cannot answer this Request, and therefore denies same.

14 REQUEST FOR ADMISSION NO. 105:

15 Admit that if a VHDL design containing only the statements "if csy or counter = 63 then counter <= 0; else" is input into the V-2003.12-SP1 version of the Synopsys products-in-suit, the resulting netlist does not constitute a netlist for an application specific integrated circuit.

18 RESPONSE:

19 Ricoh incorporates by reference objections 1-15. Ricoh further objects that this request is a hypothetical and calls for information not available to Ricoh. Ricoh has not input a VHDL design containing only the statements "if csy or counter = 63 then counter <= 0; else" into the V-2003.12-SP1 version of the Synopsys products-in-suit. Ricoh further objects because Synopsys never provided a competent witness on the V-2003.12-SP1 source code. For at least these reasons, Ricoh cannot answer this Request, and therefore denies same.

25 REQUEST FOR ADMISSION NO. 106:

26 Admit that if a VHDL design containing only the statements "if csy or counter = 63 then counter <= 0; else" is input into the V-2003.12-SP1 version of the Synopsys products-in-suit, the resulting netlist

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1 does not define the hardware cells and interconnections necessary to fabricate an application specific
 2 integrated circuit.

3 RESPONSE:

4 Ricoh incorporates by reference objections 1-15. Ricoh further objects that this request is a
 5 hypothetical and calls for information not available to Ricoh. Ricoh has not input a VHDL design
 6 containing only the statements "if csy or counter = 63 then counter <= 0; else" into the V-2003.12-SP1
 7 version of the Synopsys products-in-suit. Ricoh further objects because Synopsys never provided a
 8 competent witness on the V-2003.12-SP1 source code. For at least these reasons, Ricoh cannot answer
 9 this Request, and therefore denies same.

10 REQUEST FOR ADMISSION NO. 107

11 Admit that if a VHDL design containing only the statements "begin pe_az_data_sum <= pe_az_data_signed +- pe_az_sum_out; end process;" is input into the V-2003.12-SP1 version of the
 12 Synopsys products-in-suit, no output will result.

14 RESPONSE:

15 Ricoh incorporates by reference objections 1-15. Ricoh further objects that this request is a
 16 hypothetical and calls for information not available to Ricoh. Ricoh has not input a VHDL design
 17 containing only the statements " begin pe_az_data_sum <= pe_az_data_signed +- pe_az_sum_out; end
 18 process" into the V-2003.12-SP1 version of the Synopsys products-in-suit. Ricoh further objects
 19 because Synopsys never provided a competent witness on the V-2003.12-SP1 source code. For at least
 20 these reasons, Ricoh cannot answer this Request, and therefore denies same.

21 REQUEST FOR ADMISSION NO. 108:

22 Admit that if a VHDL design containing only the statements "begin pc_az_data_sum <= pe_az_data_signed + pe_az_sumout; end process;" is input into the V-2003.12-SP1 version of the
 23 Synopsys products-in-suit, a syntax error will result.

25 RESPONSE:

26 Ricoh incorporates by reference objections 1-15. Ricoh further objects that this request is a
 27 hypothetical and calls for information not available to Ricoh. Ricoh has not input a VHDL design

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1 containing only the statements " begin pe_az_data_sum <= pe_az_data_signed +- pe_az_sum_out; end
 2 process" into the V-2003.12-SP1 version of the Synopsys products-in-suit. Ricoh further objects
 3 because Synopsys never provided a competent witness on the V-2003.12-SP1 source code. For at least
 4 these reasons, Ricoh cannot answer this Request, and therefore denies same.

5 REQUEST FOR ADMISSION NO. 109:

6 Admit that if a VHDL design containing only the statements "begin pe_az_data_sum <= pe_az_data_signed
 7 +- pe_az_suffi_out; end process;" is input into the V-2003.12-SP1 version of the
 8 Synopsys products-in-suit, the resulting netlist does not constitute a netlist for an application specific
 9 integrated circuit.

10 RESPONSE:

11 Ricoh incorporates by reference objections 1-15. Ricoh further objects that this request is a
 12 hypothetical and calls for information not available to Ricoh. Ricoh has not input a VHDL design
 13 containing only the statements " begin pe_az_data_sum <= pe_az_data_signed +- pe_az_sum_out; end
 14 process" into the V-2003.12-SP1 version of the Synopsys products-in-suit. Ricoh further objects
 15 because Synopsys never provided a competent witness on the V-2003.12-SP1 source code. For at least
 16 these reasons, Ricoh cannot answer this Request, and therefore denies same.

17 REQUEST FOR ADMISSION NO. 110:

18 Admit that if a VHDL design containing only the statements "begin pe_az_data_sum
 19 <~pe_az_data_signed+pe_az_sum_out; end process," is input into the V-2003.12-SP1 version of the
 20 Synopsys products-in-suit, the resulting netlist does not define the hardware cell s and interconnections
 21 necessary to fabricate an application specific integrated circuit.

22 RESPONSE:

23 Ricoh incorporates by reference objections 1-15. Ricoh further objects that this request is a
 24 hypothetical and calls for information not available to Ricoh. Ricoh has not input a VHDL design
 25 containing only the statements " begin pe_az_data_sum <= pe_az_data_signed +- pe_az_sum_out; end
 26 process" into the V-2003.12-SP1 version of the Synopsys products-in-suit. Ricoh further objects

27

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1 because Synopsys never provided a competent witness on the V-2003.12-SP1 source code. For at least
 2 these reasons, Ricoh cannot answer this Request, and therefore denies same.

3 REQUEST FOR ADMISSION NO. 111:

4 Admit that if a VHDL design containing only the statements "v_ramp_down_res target := 1
 5 new_position + RAMP_DOWN_START; --168=159+ (3*3Freqs) pos_state <= move 0;" is input into
 6 the V-2003.12-SP1 version of the Synopsys products-in-suit, no output will result.

7 RESPONSE:

8 Ricoh incorporates by reference objections 1-15. Ricoh further objects that this request is a
 9 hypothetical and calls for information not available to Ricoh. Ricoh has not input a VHDL design
 10 containing only the statements " v_ramp_down_res target := 1 new_position +
 11 RAMP_DOWN_START; --168=159+ (3*3Freqs) pos_state <= move 0;" into the V-2003.12-SP1
 12 version of the Synopsys products-in-suit. Ricoh further objects because Synopsys never provided a
 13 competent witness on the V-2003.12-SP1 source code. For at least these reasons, Ricoh cannot answer
 14 this Request, and therefore denies same.

15 REQUEST FOR ADMISSION NO. 112:

16 Admit that if a VHDL design containing only the statements "v_ramp_down_res target := 1
 17 new_position + RAMP_DOWN_START; --168=159+ (3*3Freqs) pos_state <= move 0;" is input into
 18 the V-2003.12-SP 1 version of the Synopsys products-in-suit, a syntax error will result.

19 RESPONSE:

20 Ricoh incorporates by reference objections 1-15. Ricoh further objects that this request is a
 21 hypothetical and calls for information not available to Ricoh. Ricoh has not input a VHDL design
 22 containing only the statements " v_ramp_down_res target := 1 new_position +
 23 RAMP_DOWN_START; --168=159+ (3*3Freqs) pos_state <= move 0;" into the V-2003.12-SP1
 24 version of the Synopsys products-in-suit. Ricoh further objects because Synopsys never provided a
 25 competent witness on the V-2003.12-SP1 source code. For at least these reasons, Ricoh cannot answer
 26 this Request, and therefore denies same.

27 REQUEST FOR ADMISSION NO. 113:

28 RICOH'S SUPPLEMENTAL RESPONSE TO ASIC DEFENDANTS' REQUESTS FOR ADMISSIONS Ricoh v. Aeroflex C03-04669 MJJ (EMC)

1 Admit that if a VHDL design containing only the statements "v_ramp_down_res target := 1
 2 new_position + RAMP_DOWN_START; --168=159+ (3*3Freqs) pos_state <= move 0;" is input into
 3 the V-2003.12-SP1 version of the Synopsys products-in-suit, the resulting netlist does not constitute a
 4 netlist for an application specific integrated circuit.

5 RESPONSE:

6 Ricoh incorporates by reference objections 1-15. Ricoh further objects that this request is a
 7 hypothetical and calls for information not available to Ricoh. Ricoh has not input a VHDL design
 8 containing only the statements " v_ramp_down_res target := 1 new_position +
 9 RAMP_DOWN_START; --168=159+ (3*3Freqs) pos_state <= move 0;" into the V-2003.12-SP1
 10 version of the Synopsys products-in-suit. Ricoh further objects because Synopsys never provided a
 11 competent witness on the V-2003.12-SP1 source code. For at least these reasons, Ricoh cannot answer
 12 this Request, and therefore denies same.

13 REQUEST FOR ADMISSION NO. 114:

14 Admit that if a VHDL design containing only the statements "v_ramp_down_res target := 1
 15 new_position + RAMP_DOWN_START; --168=159+ (3*3Freqs) pos_state <= move 0;" is input into
 16 the V-2003.12-SP 1 version of the Synopsys products-in-suit, the resulting netlist does not define the
 17 hardware cells and interconnections necessary to fabricate an application specific integrated circuit.

18 RESPONSE:

19 Ricoh incorporates by reference objections 1-15. Ricoh further objects that this request is a
 20 hypothetical and calls for information not available to Ricoh. Ricoh has not input a VHDL design
 21 containing only the statements " v_ramp_down_res target := 1 new_position +
 22 RAMP_DOWN_START; --168=159+ (3*3Freqs) pos_state <= move 0;" into the V-2003.12-SP1
 23 version of the Synopsys products-in-suit. Ricoh further objects because Synopsys never provided a
 24 competent witness on the V-2003.12-SP1 source code. For at least these reasons, Ricoh cannot answer
 25 this Request, and therefore denies same.

26 REQUEST FOR ADMISSION NO. 115:

27
 28 RICOH'S SUPPLEMENTAL RESPONSE TO ASIC DEFENDANTS' REQUESTS FOR ADMISSIONS Ricoh v. Aeroflex C03-04669 MJJ (EMC)

1 Admit that if a Verilog design containing only the statements "always @(posedge clock or posedge
 2 rst) if(rst) hold <= 0; else" is input into the V-2003.12-SP1 version of the Synopsys products- in-suit,
 3 no output will result.

4 RESPONSE:

5 Ricoh incorporates by reference objections 1-15. Ricoh further objects that this request is a
 6 hypothetical and calls for information not available to Ricoh. Ricoh has not input a Verilog design
 7 containing only the statements " always @(posedge clock or posedge rst) if(rst) hold <= 0; else " into
 8 the V-2003.12-SP1 version of the Synopsys products-in-suit. Ricoh further objects because Synopsys
 9 never provided a competent witness on the V-2003.12-SP1 source code. For at least these reasons,
 10 Ricoh cannot answer this Request, and therefore denies same.

11 REQUEST FOR ADMISSION NO. 116:

12 Admit that if a Verilog design containing only the statements "always @(posedge clock or posedge
 13 rst) if (rst) hold <= 0; else" is input into the V-2003.12-SP1 version of the Synopsys products- in-suit, a
 14 syntax error will result.

15 RESPONSE:

16 Ricoh incorporates by reference objections 1-15. Ricoh further objects that this request is a
 17 hypothetical and calls for information not available to Ricoh. Ricoh has not input a Verilog design
 18 containing only the statements " always @(posedge clock or posedge rst) if(rst) hold <= 0; else " into
 19 the V-2003.12-SP1 version of the Synopsys products-in-suit. Ricoh further objects because Synopsys
 20 never provided a competent witness on the V-2003.12-SP1 source code. For at least these reasons,
 21 Ricoh cannot answer this Request, and therefore denies same.

22 REQUEST FOR ADMISSION NO. 117:

23 Admit that if a Verilog design containing only the statements "always @(posedge clock, or posedge
 24 rst) if (rst) hold <=0; else" is input into the V-2003.12-SP1 version of the Synopsys products-in-suit,
 25 the resulting netlist does not constitute a netlist for an application specific integrated circuit.

26 RESPONSE:

1 Ricoh incorporates by reference objections 1-15. Ricoh further objects that this request is a
 2 hypothetical and calls for information not available to Ricoh. Ricoh has not input a Verilog design
 3 containing only the statements " always @(posedge clock or posedge rst) if(rst) hold <= 0; else " into
 4 the V-2003.12-SP1 version of the Synopsys products-in-suit. Ricoh further objects because Synopsys
 5 never provided a competent witness on the V-2003.12-SP1 source code. For at least these reasons,
 6 Ricoh cannot answer this Request, and therefore denies same.

7 REQUEST FOR ADMISSION NO. 118:

8 Admit that if a Verilog design containing only the statements "always @(posedge clock or posedge
 9 rst) if (rst) hold <= 0; else" is input into the V-2003.12-SP1 version of the Synopsys products" in-suit,
 10 the resulting netlist does not define the hardware cells and interconnections necessary to fabricate an
 11 application specific integrated circuit.

12 RESPONSE:

13 Ricoh incorporates by reference objections 1-15. Ricoh further objects that this request is a
 14 hypothetical and calls for information not available to Ricoh. Ricoh has not input a Verilog design
 15 containing only the statements " always @(posedge clock or posedge rst) if(rst) hold <= 0; else " into
 16 the V-2003.12-SP1 version of the Synopsys products-in-suit. Ricoh further objects because Synopsys
 17 never provided a competent witness on the V-2003.12-SP1 source code. For at least these reasons,
 18 Ricoh cannot answer this Request, and therefore denies same.

19 REQUEST FOR ADMISSION NO. 119:

20 Admit that if a Verilog design containing only the statements "else begin case (sample_num) 0:
 21 accum <= accum + sample[0];" is input into the V-2003;12-SP1 version of the Synopsys products-in-
 22 suit, no output will result.

23 RESPONSE:

24 Ricoh incorporates by reference objections 1-15. Ricoh further objects that this request is a
 25 hypothetical and calls for information not available to Ricoh. Ricoh has not input a Verilog design
 26 containing only the statements " else begin case (sample_num) 0: accum <= accum + sample[0];" into
 27 the V-2003.12-SP1 version of the Synopsys products-in-suit. Ricoh further objects because Synopsys
 28

1 never provided a competent witness on the V-2003.12-SP1 source code. For at least these reasons,
 2 Ricoh cannot answer this Request, and therefore denies same.

3 REQUEST FOR ADMISSION NO. 120:

4 Admit that if a Verilog design containing only the statements "else begin case (sample_num) 0:
 5 accum <= accum+sample[0];" is input into the V-2003.12-SP1 version of the Synopsys products-in-
 6 suit, a syntax error will result.

7 RESPONSE:

8 Ricoh incorporates by reference objections 1-15. Ricoh further objects that this request is a
 9 hypothetical and calls for information not available to Ricoh. Ricoh has not input a Verilog design
 10 containing only the statements " else begin case (sample_num) 0: accum <= accum + sample[0];" into
 11 the V-2003.12-SP1 version of the Synopsys products-in-suit. Ricoh further objects because Synopsys
 12 never provided a competent witness on the V-2003.12-SP1 source code. For at least these reasons,
 13 Ricoh cannot answer this Request, and therefore denies same.

14 REQUEST FOR ADMISSION NO. 121:

15 Admit that if a Verilog design containing only the statements "else begin case (sample_num) 0:
 16 accum <= accum + sample[0];" is input into the V-2003.12-SP1 version of the Synopsys products-in-
 17 suit, the resulting netlist does not constitute a netlist for an application specific integrated circuit.

18 RESPONSE:

19 Ricoh incorporates by reference objections 1-15. Ricoh further objects that this request is a
 20 hypothetical and calls for information not available to Ricoh. Ricoh has not input a Verilog design
 21 containing only the statements " else begin case (sample_num) 0: accum <= accum + sample[0];" into
 22 the V-2003.12-SP1 version of the Synopsys products-in-suit. Ricoh further objects because Synopsys
 23 never provided a competent witness on the V-2003.12-SP1 source code. For at least these reasons,
 24 Ricoh cannot answer this Request, and therefore denies same.

25 REQUEST FOR ADMISSION NO. 122:

26 Admit that if a Verilog design containing only the statements "else begin case (sample_num) 0:
 27 accum <= accum + sample[0];" is input into the V-2003.12-SP1 version of the Synopsys products-in-

1 suit, the resulting netlist does not define the hardware cells and interconnections necessary to fabricate
 2 an application specific integrated circuit.

3 **RESPONSE:**

4 Ricoh incorporates by reference objections 1-15. Ricoh further objects that this request is a
 5 hypothetical and calls for information not available to Ricoh. Ricoh has not input a Verilog design
 6 containing only the statements " else begin case (sample_num) 0: accum <= accum + sample[0];" into
 7 the V-2003.12-SP1 version of the Synopsys products-in-suit. Ricoh further objects because Synopsys
 8 never provided a competent witness on the V-2003.12-SP1 source code. For at least these reasons,
 9 Ricoh cannot answer this Request, and therefore denies same.

10 **REQUEST FOR ADMISSION NO. 123:**

11 Admit that if a VHDL design containing only the statements "case astate is when IDO => if (apostate
 12 ='1') then" is input into the V-2003.12-SP1 version of the Synopsys products-in-suit, no output will
 13 result.

14 **RESPONSE:**

15 Ricoh incorporates by reference objections 1-15. Ricoh further objects that this request is a
 16 hypothetical and calls for information not available to Ricoh. Ricoh has not input a VHDL design
 17 containing only the statements "case astate is when IDO => if (apostate ='1') then" into the V-2003.12-
 18 SP1 version of the Synopsys products-in-suit. Ricoh further objects because Synopsys never provided
 19 a competent witness on the V-2003.12-SP1 source code. For at least these reasons, Ricoh cannot
 20 answer this Request, and therefore denies same.

21 **REQUEST FOR ADMISSION NO. 124:**

22 Admit that if a VHDL design containing only the statements "case astate is when IDO => if (apostate
 23 ='1') then" is input into the V-2003.12-SP1 version of the Synopsys products-in-suit, a syntax error will
 24 result.

25 **RESPONSE:**

26 Ricoh incorporates by reference objections 1-15. Ricoh further objects that this request is a
 27 hypothetical and calls for information not available to Ricoh. Ricoh has not input a VHDL design

1 containing only the statements "case astate is when IDO => if (apostate ='1') then" into the V-2003.12-
 2 SP1 version of the Synopsys products-in-suit. Ricoh further objects because Synopsys never provided
 3 a competent witness on the V-2003.12-SP1 source code. For at least these reasons, Ricoh cannot
 4 answer this Request, and therefore denies same.

5 REQUEST FOR ADMISSION NO. 125:

6 Admit that if a VHDL design containing only the statements "case astate is when IDO => if (apostate
 7 ='1') then" is input into the V-2003.12-SP1 version of the Synopsys products-in-suit, the resulting
 8 netlist does not constitute a netlist for an application specific integrated circuit.

9 RESPONSE:

10 Ricoh incorporates by reference objections 1-15. Ricoh further objects that this request is a
 11 hypothetical and calls for information not available to Ricoh. Ricoh has not input a VHDL design
 12 containing only the statements "case astate is when IDO => if (apostate ='1') then" into the V-2003.12-
 13 SP1 version of the Synopsys products-in-suit. Ricoh further objects because Synopsys never provided
 14 a competent witness on the V-2003.12-SP1 source code. For at least these reasons, Ricoh cannot
 15 answer this Request, and therefore denies same.

16 REQUEST FOR ADMISSION NO. 126:

17 Admit that if a VHDL design containing only the statements "case astate is when IDO => if (apostate
 18 ='1') then" is input into the V-2003.12-SP1 version of the Synopsys products-in-suit, the resulting
 19 netlist does not define the hardware cells and interconnections necessary to fabricate an application
 20 specific integrated circuit.

21 RESPONSE:

22 Ricoh incorporates by reference objections 1-15. Ricoh further objects that this request is a
 23 hypothetical and calls for information not available to Ricoh. Ricoh has not input a VHDL design
 24 containing only the statements "case astate is when IDO => if (apostate ='1') then" into the V-2003.12-
 25 SP1 version of the Synopsys products-in-suit. Ricoh further objects because Synopsys never provided
 26 a competent witness on the V-2003.12-SP1 source code. For at least these reasons, Ricoh cannot
 27 answer this Request, and therefore denies same.

28 RICOH'S SUPPLEMENTAL RESPONSE TO ASIC DEFENDANTS' REQUESTS FOR ADMISSIONS Ricoh v. Aeroflex C03-04669 MJJ (EMC)

1 REQUEST FOR ADMISSION NO. 127:

2 Admit that mask data cannot be used directly to fabricate an application specific integrated circuit.

3 RESPONSE:

4 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms "mask data
5 cannot be used directly to fabricate an application specific integrated circuit" as being vague and
6 ambiguous as to what the defendants may mean by the terms. The parties have stipulated that mask
7 data is used to fabricate an application specific integrated circuit. To the extent that his request seeks
8 any other information, and for at least those objections noted, Ricoh denies the remainder of the
9 Request.

10 REQUEST FOR ADMISSION NO. 128:

11 Admit that mask data is used to create a mask prior to the fabrication of an application specific
12 integrated circuit.

13 RESPONSE:

14 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms "mask data is
15 used to create a mask prior to the fabrication of an application specific integrated circuit" as being
16 vague and ambiguous as to what the defendants may mean by the terms. Ricoh admits that mask data
17 can be used to create a mask. The parties have stipulated that mask data is used to fabricate an
18 application specific integrated circuit. To the extent that his request seeks any other information, and
19 for at least those objections noted, Ricoh denies the remainder of the Request.

20 REQUEST FOR ADMISSION NO. 129:

21 Admit that the rules identified in Col. 11:48-12:29 of the '432 patent are exemplary only.

22 RESPONSE:

23 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms "rules identified
24 in Col. 11:48-12:29 of the '432 patent are exemplary only" as being vague and ambiguous as to what
25 the defendants may mean by the terms. For at least those reasons, Ricoh denies the Request.

26 REQUEST FOR ADMISSION NO. 130:

27

28 RICOH'S SUPPLEMENTAL RESPONSE TO ASIC DEFENDANTS' REQUESTS FOR ADMISSIONS Ricoh v. Aeroflex C03-04669 MJJ (EMC)

1 Admit that the rules identified in Col. 11:48-12:29 of the '432 patent are exemplary only and are not
2 intended to be a complete set of rules for a expert system knowledge base.

3 RESPONSE:

4 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms "rules identified
5 in Col. 11:48-12:29 of the '432 patent are exemplary only and are not intended to be a complete set of
6 rules for a expert system knowledge base" as being vague and ambiguous as to what the defendants
7 may mean by the terms. For at least those reasons, Ricoh denies the Request.

8 REQUEST FOR ADMISSION NO. 131:

9 Admit that the rules identified in Col. 11:48-12:29 of the '432 patent are not intended to be a
10 complete set of rules for an "expert system knowledge base" as used in Claim 13 of the '432 patent.

11 RESPONSE:

12 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms "are not intended
13 to be a complete set of rules for an expert system knowledge base" as being vague and ambiguous as to
14 what the defendants may mean by the terms. For at least those reasons, Ricoh denies the Request.

15 REQUEST FOR ADMISSION NO. 132:

16 Admit that the rules identified in Col. 11:48-12:29 of the '432 patent are a complete set of rules for
17 an "expert system knowledge base" as used in Claim 13 of the '432 patent.

18 RESPONSE:

19 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms "are a complete
20 set of rules for an "expert system knowledge base"" as being vague and ambiguous as to what the
21 defendants may mean by the terms. For at least those reasons, Ricoh denies the Request.

22 REQUEST FOR ADMISSION NO. 133:

23 Admit that an application specific integrated circuit design tool that included only the rules set forth
24 in Col. 11:48-12:29 of the '432 patent could not be used to create a netlist for an application specific
25 integrated circuit.

26 RESPONSE:

27

28 RICOH'S SUPPLEMENTAL RESPONSE TO ASIC DEFENDANTS' REQUESTS FOR ADMISSIONS Ricoh v. Aeroflex C03-04669 MJJ (EMC)

1 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms "an application
2 specific integrated circuit design tool that included only the rules set forth in Col. 11:48-12:29 of the
3 '432 patent could not be used to create a netlist for an application specific integrated circuit" as being
4 vague and ambiguous as to what the defendants may mean by the terms. For at least those reasons,
5 Ricoh denies the Request.

6 REQUEST FOR ADMISSION NO. 134:

7 Admit that in 1988 the KBSC system had more rules than are disclosed in the '432 patent.

8 RESPONSE:

9 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms "in 1988 the
10 KBSC system had more rules than are disclosed in the '432 patent" as being vague and ambiguous as
11 to what the defendants may mean by the terms. In particular, "the KBSC system" is not defined and
12 Ricoh is unable to determine what defendants mean by that phrase. For at least those reasons, Ricoh is
13 unable to admit or deny the request, and therefore denies the Request.

14 REQUEST FOR ADMISSION NO. 135:

15 Admit that in 1989 the KBSC system had more rules than are disclosed in the '432 patent.

16 RESPONSE:

17 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms "in 1989 the
18 KBSC system had more rules than are disclosed in the '432 patent" as being vague and ambiguous as
19 to what the defendants may mean by the terms. In particular, "the KBSC system" is not defined and
20 Ricoh is unable to determine what defendants mean by that phrase. For at least those reasons, Ricoh is
21 unable to admit or deny the request, and therefore denies the Request.

22 REQUEST FOR ADMISSION NO. 136:

23 Admit that in 1990 the KBSC system had more rules than are disclosed in the '432 patent.

24 RESPONSE:

25 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms "in 1990 the
26 KBSC system had more rules than are disclosed in the '432 patent" as being vague and ambiguous as
27 to what the defendants may mean by the terms. In particular, "the KBSC system" is not defined and

28 RICOH'S SUPPLEMENTAL RESPONSE TO ASIC DEFENDANTS' REQUESTS FOR ADMISSIONS Ricoh v. Aeroflex C03-04669 MJJ (EMC)

1 Ricoh is unable to determine what defendants mean by that phrase. For at least those reasons, Ricoh is
2 unable to admit or deny the request, and therefore denies the Request.

3 REQUEST FOR ADMISSION NO. 137:

4 Admit that mapping HDL operators to synthetic operators, in the V-2003.12-SP1 version of the
5 Synopsys products-in-suit, does not include applying "rules" as the term "rules" is used in Claim 13 of
6 the'432 patent.

7 RESPONSE:

8 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms "mapping HDL
9 operators to synthetic operators, in the V-2003.12-SP1 version of the Synopsys products-in-suit, does
10 not include applying "rules" as the term "rules" is used in Claim 13 of the'432 patent" as being vague
11 and ambiguous as to what the defendants may mean by the terms. Ricoh further objects because
12 Synopsys never provided a competent witness on the V-2003.12-SP1 source code. For at least these
13 reasons, Ricoh cannot answer this Request, and therefore denies same.

14 REQUEST FOR ADMISSION NO. 138:

15 Admit that mapping HDL operators to synthetic operators, in the v-2003.12-SP1 version of the
16 Synopsys products-in-suit, does not include applying "cell selection rules" as the term "cell selection
17 rules" is used in Claim 13 of the '432 patent.

18 RESPONSE:

19 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms "mapping HDL
20 operators to synthetic operators, in the v-2003.12-SP1 version of the Synopsys products-in-suit, does
21 not include applying "cell selection rules" as the term "cell selection rules" is used in Claim 13 of the
22 '432 patent" as being vague and ambiguous as to what the defendants may mean by the terms. Ricoh
23 further objects because Synopsys never provided a competent witness on the V-2003.12-SP1 source
24 code. For at least these reasons, Ricoh cannot answer this Request, and therefore denies same.

25 REQUEST FOR ADMISSION NO. 139:

26 Admit that mapping synthetic operators to synthetic modules, in the V-2003.12-SP1 version of the
27 Synopsys products-in-suit, does not include applying "rules" as the term "rules" is used in Claim

28 RICOH'S SUPPLEMENTAL RESPONSE TO ASIC DEFENDANTS' REQUESTS FOR ADMISSIONS Ricoh v. Aeroflex C03-04669 MJJ (EMC)

1 13 of the '432 patent.

2 RESPONSE:

3 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms "mapping
4 synthetic operators to synthetic modules, in the V-2003.12-SP1 version of the Synopsys products-in-
5 suit, does not include applying "rules" as the term "rules" is used in Claim 13 of the '432 patent" as
6 being vague and ambiguous as to what the defendants may mean by the terms. Ricoh further objects
7 because Synopsys never provided a competent witness on the V-2003.12-SP1 source code. For at least
8 these reasons, Ricoh cannot answer this Request, and therefore denies same.

9 REQUEST FOR ADMISSION NO. 140:

10 Admit that mapping synthetic operators to synthetic modules, in the V-2003.12-SP1 version of the
11 Synopsys products-in-suit, does not include applying "cell selection rules" as the term "cell selection
12 rules" is used in Claim 13 of the "432 patent.

13 RESPONSE:

14 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms "mapping
15 synthetic operators to synthetic modules, in the V-2003.12-SP1 version of the Synopsys products-in-
16 suit, does not include applying "cell selection rules" as the term "cell selection rules" is used in Claim
17 13 of the "432 patent" as being vague and ambiguous as to what the defendants may mean by the
18 terms. Ricoh further objects because Synopsys never provided a competent witness on the V-2003.12-
19 SP1 source code. For at least these reasons, Ricoh cannot answer this Request, and therefore denies
20 same.

21 REQUEST FOR ADMISSION NO. 141:

22 Admit that mapping generic operators to synthetic modules, in the V-2003.12-SP1 version of the
23 Synopsys products-in-suit, does not include applying "rules" as the term "rules" is used in Claim 13 of
24 the '432 patent.

25 RESPONSE:

26 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms "mapping generic
27 operators to synthetic modules, in the V-2003.12-SP1 version of the Synopsys products-in-suit, does

1 not include applying "rules" as the term "rules" is used in Claim 13 of the '432 patent" as being vague
 2 and ambiguous as to what the defendants may mean by the terms. Ricoh further objects because
 3 Synopsys never provided a competent witness on the V-2003.12-SP1 source code. For at least these
 4 reasons, Ricoh cannot answer this Request, and therefore denies same.

5 REQUEST FOR ADMISSION NO. 142:

6 Admit that mapping generic operators to synthetic modules, in the V-2003.12-SP1 version of the
 7 Synopsys products-in-suit, does not include applying "cell selection rules" as the term "cell
 8 selection rules" is used in Claim 13 of the '432 patent.

9 RESPONSE:

10 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms "mapping generic
 11 operators to synthetic modules, in the V-2003.12-SP1 version of the Synopsys products-in-suit, does
 12 not include applying "cell selection rules" as the term "cell selection rules" is used in Claim 13 of the
 13 '432 patent" as being vague and ambiguous as to what the defendants may mean by the terms. Ricoh
 14 further objects because Synopsys never provided a competent witness on the V-2003.12-SP1 source
 15 code. For at least these reasons, Ricoh cannot answer this Request, and therefore denies same.

16 REQUEST FOR ADMISSION NO. 143:

17 Admit that mapping synthetic modules to Designware implementations, in the V-2003.12-SP1
 18 version of the Synopsys products-in-suit, does not include applying "rules" as the term "rules" is used
 19 in Claim 13 of the '432 patent.

20 RESPONSE:

21 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms "mapping
 22 synthetic modules to Designware implementations, in the V-2003.12-SP1 version of the Synopsys
 23 products-in-suit, does not include applying "rules" as the term "rules" is used in Claim 13 of the '432
 24 patent" as being vague and ambiguous as to what the defendants may mean by the terms. Ricoh
 25 further objects because Synopsys never provided a competent witness on the V-2003.12-SP1 source
 26 code. For at least these reasons, Ricoh cannot answer this Request, and therefore denies same.

27 REQUEST FOR ADMISSION NO. 144:

28 RICOH'S SUPPLEMENTAL RESPONSE TO ASIC DEFENDANTS' REQUESTS FOR ADMISSIONS Ricoh v. Aeroflex C03-04669 MJJ (EMC)

1 Admit that mapping synthetic modules to Designware implementations, in the V-2003.12-SP1
 2 version of the Synopsys products-in-suit, does not include applying "cell selection rules" as the term
 3 "cell selection rules" is used in Claim 13 of the '432 patent.

4 RESPONSE:

5 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms "mapping
 6 synthetic modules to Designware implementations, in the V-2003.12-SP1 version of the Synopsys
 7 products-in-suit, does not include applying "cell selection rules" as the term "cell selection rules" is
 8 used in Claim 13 of the '432 patent" as being vague and ambiguous as to what the defendants may
 9 mean by the terms. Ricoh further objects because Synopsys never provided a competent witness on
 10 the V-2003.12-SP1 source code. For at least these reasons, Ricoh cannot answer this Request, and
 11 therefore denies same.

12

13 As to responses and objections:

14 Dated: June 8, 2006

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23
 24 RICOH'S SUPPLEMENTAL RESPONSE TO ASIC DEFENDANTS' REQUESTS FOR ADMISSIONS Ricoh v. Aeroflex C03-04669 MJJ (EMC)

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

RICOH COMPANY, LTD.,)
Plaintiff,) Case No. C-03-4669-MJJ (EMC)
v.)
AEROFLEX ET AL.,) CERTIFICATE OF SERVICE
Defendants.)

I am employed in Washington, District of Columbia. I am over the age of eighteen (18) years and not a party to the within action; my business address is 2101 L Street, NW, Washington, DC, 20037. On June 8, 2006, I served **RICOH'S SUPPLEMENTAL RESPONSE TO ASIC DEFENDANTS' REQUESTS FOR ADMISSIONS (NOS. 1-144)** on the parties, through their attorneys of record, by sending true copies thereof to the e-mail addresses listed below:

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I declare that I am employed in the office of a member *pro hac vice* of the Bar of this Court at whose direction this service was made.

I declare under penalty of perjury that the foregoing is true and correct. Executed in Washington, D.C. on June 8, 2006.

Solomon Seyoum

Exhibit 3

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14 Attorneys for the Ricoh Company, Ltd.

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

18)
19 RICOH COMPANY, LTD,) Case No. C03-04669 MJJ (EMC)
20 Plaintiff,)
21 vs.) RICOH'S SUPPLEMENTAL RESPONSE
22 Aeroflex et al.,) TO ASIC DEFENDANTS' SECOND
23 Defendants.) REQUESTS FOR ADMISSIONS (Nos.
) 145-274)
-----)

Pursuant to Rules 26 and 36 of the Federal Rules of Civil Procedure, Ricoh Company, Ltd., (“Ricoh”) hereby responds to ASIC defendants’ second Requests for Admission (Nos. 145-274).

1 These responses are based on information reasonably available to Ricoh at the present time.
2 Ricoh reserves the right to supplement these responses when, and if, additional information becomes
3 available. Ricoh also reserves the right to object on any ground at any time to such other or
4 supplemental Requests for Admission ASIC defendants may propound involving or relating to the
5 subject matter of these Requests.

OBJECTIONS

7 1. Ricoh objects to all of the Requests to the extent that they seek information or documents
8 protected by the attorney-client privilege, the work product doctrine, and/or any other privilege or
9 immunity. Ricoh does not intend to provide ASIC defendants. (“ASIC defendants” or “defendants”)
10 with such protected information. Moreover, any inadvertent disclosure of such information, or any
11 disclosure of documents underlying that information, shall not be deemed a waiver of the attorney-
12 client privilege, the work product doctrine, or any other privilege or immunity.

13 2. Ricoh objects to all of the Requests to the extent that they seek information that is subject to
14 any protective order, privacy interest, contractual obligation, non-disclosure agreement, confidentiality
15 agreement or other such confidentiality obligation owed to any third party. Without third party
16 permission, Ricoh will not provide such information unless required by the Court.

17 3. Ricoh objects to all of the Requests to the extent that they seek to impose an obligation of a
18 continuing nature beyond that required by FRCP 26(e).

19 4. Ricoh objects to all of the Requests to the extent that they seek to impose a premature
20 obligation to provide information in light of Patent Local Rules, including, but not limited to, Patent
21 Local Rule 2-5.

22 5. Ricoh objects to all of the Requests as overly broad and unduly burdensome to the extent that
23 they seek information beyond what is available from a reasonable search of Ricoh's files likely to
24 contain relevant or responsive documents and a reasonable inquiry of Ricoh's current employees.

25 6. Ricoh objects to all of the Requests as unduly burdensome to the extent that they seek
26 information that can be determined from a reasonable search of ASIC defendants' own internal files

1 and a reasonable inquiry of ASIC defendants' own employees, as such it would be more convenient,
 2 less burdensome, less expensive for ASIC defendants to perform an internal search.

3 7. Ricoh objects to the definition of "Ricoh," "Plaintiff," "you," and "your" because the phrase
 4 "predecessors in interest" both is vague so as to not be clear and comprehensible and also is overly
 5 broad because the phrase purports to include independent third parties (e.g., International Chip
 6 Corporation and Knowledge Based Silicon Corporation). In responding to these requests, Ricoh limits
 7 its response to Ricoh Company, Ltd. However, if specifically requested, Ricoh may be willing to
 8 provide information relating to the International Chip Corporation and Knowledge Based Silicon
 9 Corporation if such information is within Ricoh's possession, custody and control. Further, with
 10 respect to Requests seeking information from individual persons within Ricoh, Ricoh limits its
 11 response to current employees. Ricoh objects to all of the Requests as overly broad and unduly
 12 burdensome to the extent that they seek information beyond what is available from a reasonable search
 13 of Ricoh's files likely to contain relevant or responsive documents and a reasonable inquiry of Ricoh's
 14 current employees.

15 8. Ricoh objects to all of the Requests as being unduly burdensome because of the excessive
 16 number of Requests.

17 9. Ricoh objects to all of the Requests to the extent that the request seeks information that is not
 18 reasonably calculated to lead to the discovery of admissible evidence.

19 10. Ricoh objects to all of the Requests to the extent that the request seeks information that is
 20 before the relevant time period. As such, in its response to any Request, Ricoh limits the relevant time
 21 period to 1997 to the present.

22 11. Ricoh objects to all of the Requests to the extent that the request seeks information that is
 23 contentious, and Ricoh has not yet provided its final contentions and responses to contentions.

24 12. Ricoh objects to all of the Requests to the extent that the request seeks information that is the
 25 subject of expert testimony or expert opinion, and expert testimony and/or expert opinion is premature.

26 13. In gathering relevant and responsive information, Ricoh has interpreted the Requests utilizing
 27 ordinary meanings of words and has expended reasonable efforts to identify information that appears

1 responsive. To the extent that the Requests purport to seek information other than as so interpreted,
2 Ricoh objects on the ground that the Requests are vague, ambiguous and overbroad.

3 14. Discovery and trial preparation in this matter have not been completed. Ricoh is continuing its
4 investigation to obtain information responsive to the Requests. Therefore, all of the following
5 responses are given without prejudice to Ricoh's right to introduce documents or information
6 discovered or deemed responsive subsequent to the date of these responses.

7 15. Any statements made herein regarding Ricoh’s intention to provide information or documents
8 responsive to any given Requests does not necessarily indicate or imply the existence of any
9 information or documents responsive thereto. Furthermore, any information provided or referred to
10 herein is not deemed to be a waiver of Ricoh’s objections as to the competency, relevance, privilege or
11 admissibility of evidence in this or any subsequent proceeding or trial in this or any other action for
12 any purpose whatsoever. In addition, Ricoh reserves the right to supplement or amend its response to
13 the Requests based upon information, documents, and things it receives during discovery or obtains
14 upon further investigation.

RESPONSES

16 | Request for Admission No. 145.

17 Admit that the specification of the '432 patent does not disclose any input specification for the claimed
18 invention other than a flowchart.

19 | Response:

20 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms “the specification
21 of the '432 patent does not disclose any input specification for the claimed invention other than a
22 flowchart” as being vague and ambiguous as to what the defendants may mean by the terms. Ricoh
23 admits that the '432 patent enables “a user to define functional architecture independent specifications
24 for the integrated circuit and which translates the functional architecture independent specifications
25 into the detailed information needed for directly producing the integrated circuit.” Otherwise, denied.

26 | Request for Admission No. 146.

27

28 RICOH'S SUPPLEMENTAL RESPONSE TO ASIC DEFENDANTS' SECOND REQUESTS FOR ADMISSIONS
Bischoff v. Aeroflow CO2 04660 MH (EMG)

1 Admit that the application for the '432 patent, as filed on or about January 13, 1998, does not contain
2 the phrase "architecture independent."

3 **Response:**

4 Ricoh incorporates by reference objections 1-15. Ricoh admits that the initial application for what
5 eventually became the '432 patent, as filed on or about January 13, 1998, and which when approved by
6 the Patent Office and issued contained the phrase "architecture independent", did not on January 13,
7 1998 expressly contain the phrase "architecture independent." Ricoh otherwise denies the request.

8 **Request for Admission No. 147.**

9 Admit that the specification of the '432 patent does not disclose how the speed of an application
10 specific integrated circuit may be entered as a design constraint so that the Cell Selector 32 can select
11 an appropriate cell based on its time delay.

12 **Response:**

13 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms "specification of
14 the '432 patent does not disclose how the speed of an application specific integrated circuit may be
15 entered as a design constraint so that the Cell Selector 32 can select an appropriate cell based on its
16 time delay" as being vague and ambiguous as to what the defendants may mean by the terms. Ricoh
17 admits that the '432 patent specifies that time delay is one factor that may be the basis of cell selection.

18 Otherwise, denied.

19 **Request for Admission No. 148.**

20 Admit that the specification of the '432 patent does not disclose when the speed of an application
21 specific integrated circuit may be entered as a design constraint so that the Cell Selector 32 can select
22 an appropriate cell based on its time delay.

23 **Response:**

24 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms "the specification
25 of the '432 patent does not disclose when the speed of an application specific integrated circuit may be
26 entered as a design constraint so that the Cell Selector 32 can select an appropriate cell based on its
27 time delay" as being vague and ambiguous as to what the defendants may mean by the terms. Ricoh

1 admits that the '432 patent specifies that time delay is one factor that may be the basis of cell selection.
2 Otherwise, denied.

3 **Request for Admission No. 149.**

4 Admit that the specification of the '432 patent does not disclose how the power consumption of an
5 application specific integrated circuit may be entered as a design constraint so that the Cell Selector 32
6 can select an appropriate cell based on its power consumption.

7 **Response:**

8 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms "the specification
9 of the '432 patent does not disclose how the power consumption of an application specific integrated
10 circuit may be entered as a design constraint so that the Cell Selector 32 can select an appropriate cell
11 based on its power consumption" as being vague and ambiguous as to what the defendants may mean
12 by the terms. Ricoh admits that the '432 patent specifies that power consumption is one factor that
13 may be the basis of cell selection. Otherwise, denied.

14 **Request for Admission No. 150.**

15 Admit that the specification of the '432 patent does not disclose when the power consumption of an
16 application specific integrated circuit may be entered as a design constraint so that the Cell Selector 32
17 can select an appropriate cell based on its power consumption.

18 **Response:**

19 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms "the specification
20 of the '432 patent does not disclose when the power consumption of an application specific integrated
21 circuit may be entered as a design constraint so that the Cell Selector 32 can select an appropriate cell
22 based on its power consumption" as being vague and ambiguous as to what the defendants may mean
23 by the terms. Ricoh admits that the '432 patent specifies that power consumption is one factor that
24 may be the basis of cell selection, otherwise, for at least the aforementioned reasons, Ricoh cannot
25 respond to the request because it is vague and therefore denies same.

26 **Request for Admission No. 151.**

27

28 RICOH'S SUPPLEMENTAL RESPONSE TO ASIC DEFENDANTS' SECOND REQUESTS FOR ADMISSIONS
Ricoh v. Aeroflex C03-04669 MJJ (EMC)

1 Admit that the specification of the '432 patent does not disclose how the chip area of an application
2 specific integrated circuit may be entered as a design constraint so that the Cell Selector 32 can select
3 an appropriate cell based on its height and width.

4 **Response:**

5 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms "the specification
6 of the '432 patent does not disclose how the chip area of an application specific integrated circuit may
7 be entered as a design constraint so that the Cell Selector 32 can select an appropriate cell based on its
8 height and width" as being vague and ambiguous as to what the defendants may mean by the terms.
9 The phrase "the chip area" is not used in the patent, and no other definition has been provided. For at
10 least those reasons, Ricoh cannot respond to the request and therefore denies same.

11 **Request for Admission No. 152.**

12 Admit that the specification of the '432 patent does not disclose when the chip area of an application
13 specific integrated circuit may be entered as a design constraint so that the Cell Selector 32 can select
14 an appropriate cell based on its height and width.

15 **Response:**

16 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms "the specification
17 of the '432 patent does not disclose when the chip area of an application specific integrated circuit may
18 be entered as a design constraint so that the Cell Selector 32 can select an appropriate cell based on its
19 height and width" as being vague and ambiguous as to what the defendants may mean by the terms.
20 The phrase "the chip area" is not used in the patent, and no other definition ahs been provided. For at
21 least those reasons, Ricoh cannot respond to the request and therefore denies same.

22 **Request for Admission No. 153.**

23 Admit that the specification of the '432 patent does not disclose any particular method or tool for
24 generating mask data.

25 **Response:**

26 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the term "any particular
27 method or tool for generating mask data" as being vague and ambiguous as to what the defendants may

1 mean by the terms. Ricoh admits that the parties have agreed in principle to stipulate substantially as
2 follows: "The output of the 2003.12 version of Design Compiler is a netlist. That netlist is used to
3 produce a GDS II file. One or more GDS II files are used to produce mask data. Mask data are used
4 to create photomasks. Photomasks are used by a foundry for purposes of production of the ASIC."
5 Otherwise, Ricoh cannot respond to the request because it is ambiguous, and therefore denies same.

6 **Request for Admission No. 154.**

7 Admit that the specification of the '432 patent does not disclose any preferred method or tool for
8 generating mask data.

9 **Response:**

10 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the term "does not disclose
11 any preferred method or tool for generating mask data" as being vague and ambiguous as to what the
12 defendants may mean by the terms. Ricoh admits that the parties have agreed in principle to stipulate
13 substantially as follows: "The output of the 2003.12 version of Design Compiler is a netlist. That
14 netlist is used to produce a GDS II file. One or more GDS II files are used to produce mask data.
15 Mask data are used to create photomasks. Photomasks are used by a foundry for purposes of
16 production of the ASIC." Otherwise, Ricoh cannot respond to the request because it is ambiguous, and
17 therefore denies same.

18 **Request for Admission No. 155.**

19 Admit that the specification of the '432 patent does not disclose any method or tool for generating
20 mask data that was proprietary to Ricoh.

21 **Response:**

22 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the term "does not disclose
23 any method or tool for generating mask data that was proprietary to Ricoh." as being vague and
24 ambiguous as to what the defendants may mean by the terms. Ricoh admits that the parties have
25 agreed in principle to stipulate substantially as follows: "The output of the 2003.12 version of Design
26 Compiler is a netlist. That netlist is used to produce a GDS II file. One or more GDS II files are used
27 to produce mask data. Mask data are used to create photomasks. Photomasks are used by a foundry

1 for purposes of production of the ASIC." Otherwise, Ricoh cannot respond to the request because it is
2 ambiguous, and therefore denies same.

3 **Request for Admission No. 156.**

4 Admit that the specification of the '432 patent does not disclose any method or tool for generating
5 mask data that was proprietary to ICC.

6 **Response:**

7 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the term "does not disclose
8 any method or tool for generating mask data that was proprietary to ICC" as being vague and
9 ambiguous as to what the defendants may mean by the terms. Ricoh admits that the parties have
10 agreed in principle to stipulate substantially as follows: "The output of the 2003.12 version of Design
11 Compiler is a netlist. That netlist is used to produce a GDS II file. One or more GDS II files are used
12 to produce mask data. Mask data are used to create photomasks. Photomasks are used by a foundry
13 for purposes of production of the ASIC." Otherwise, Ricoh cannot respond to the request because it is
14 ambiguous, and therefore denies same.

15 **Request for Admission No. 157.**

16 Admit that Ricoh delivered "design rules" to ICC in accordance with the terms of KBSC 000005-
17 000007.

18 **Response:**

19 Ricoh incorporates by reference objections 1-15. Ricoh incorporates by reference its restated response
20 to Interrogatory 29 of Matrox Electronic Systems LTD.'s Second Set of Interrogatories. Except as
21 admitted therein, denied.

22 **Request for Admission No. 158.**

23 Admit that Ricoh delivered "general cell libraries" to ICC in accordance with the terms if KBSC
24 000005-000007.

25 **Response:**

26

27

28 RICOH'S SUPPLEMENTAL RESPONSE TO ASIC DEFENDANTS' SECOND REQUESTS FOR ADMISSIONS
Ricoh v. Aeroflex C03-04669 MJJ (EMC)

1 Ricoh incorporates by reference objections 1-15. Ricoh incorporates by reference its restated response
2 to Interrogatory 30 of Matrox Electronic Systems LTD.'s Second Set of Interrogatories. Except as
3 admitted therein, denied.

4 **Request for Admission No. 159.**

5 Admit that ICC provided its ASIC design software to Ricoh in accordance with the terms if KBSC
6 000005 - 000007.

7 **Response:**

8 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms "its ASIC design
9 software" as being vague and ambiguous as to what software. Subject to these objections, Ricoh
10 incorporates by reference Mr. Oka's 30(b)(6) deposition testimony, where he stated that, pursuant to
11 the terms of KBSC 000005 – 000007, ICC delivered certain software to Ricoh. Except as admitted
12 therein, the request is denied.

13 **Request for Admission No. 160.**

14 Admit that KBSC 000001-0000003 was signed on or before January 15, 1987.

15 **Response:**

16 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms "KBSC 000001-
17 0000003 was signed on or before January 15, 1987" as being vague and ambiguous as to signed by
18 whom. Ricoh admits that the agreement KBSC 000001-0000003 states that it was made as of January
19 15, 1987. Otherwise denied.

20 **Request for Admission No. 161.**

21 Admit that KBSC 000001-0000003 was signed on or before January 13, 1987.

22 **Response:**

23 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms "KBSC 000001-
24 0000003 was signed on or before January 13, 1987" as being vague and ambiguous as to signed by
25 whom. Ricoh admits that the agreement KBSC 000001-0000003 states that it was made as of January
26 15, 1987. Otherwise denied.

27 **Request for Admission No. 162.**

28 RICOH'S SUPPLEMENTAL RESPONSE TO ASIC DEFENDANTS' SECOND REQUESTS FOR ADMISSIONS
Ricoh v. Aeroflex C03-04669 MJJ (EMC)

1 Admit that the terms of KBSC 000001 -0000003 were agreed to in principal on or before January 15,
2 1987.

3 **Response:**

4 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms "the terms of
5 KBSC 000001 -0000003 were agreed to in principal [sic] on or before January 15, 1987" as being
6 vague and ambiguous as to what the defendants may mean by the terms. Ricoh admits that the
7 agreement KBSC 000001-0000003 states that it was made as of January 15, 1987. Otherwise denied.

8 **Request for Admission No. 163.**

9 Admit that the terms of Tooru Ozeki participated in the development of the software that was delivered
10 to Ricoh in or about August of 1987 pursuant to the terms of KBSC 000001 - 0000003.

11 **Response:**

12 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms "the terms of
13 Tooru Ozeki participated in the development of the software that was delivered to Ricoh in or about
14 August of 1987 pursuant to the terms of KBSC 000001 - 0000003" as being vague and ambiguous as
15 to what the defendants may mean by the terms, and therefore denies same.

16 **Request for Admission No. 164.**

17 Admit that the terms of Yoon-Pin Foo participated in the development of the software that was
18 delivered to Ricoh in or about August of 1987 pursuant to the terms of KBSC 000001- 0000003.

19 **Response:**

20 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms "terms of Yoon-
21 Pin Foo participated in the development of the software that was delivered to Ricoh in or about August
22 of 1987 pursuant to the terms of KBSC 000001- 0000003" as being vague and ambiguous as to what
23 the defendants may mean by the terms, and therefore denies same.

24 **Request for Admission No. 165.**

25 Admit that the terms of Ricky Darwin participated in the development of the software that was
26 delivered to Ricoh in or about August of 1987 pursuant to the terms of KBSC 000001- 0000003.

27 **Response:**

28 RICOH'S SUPPLEMENTAL RESPONSE TO ASIC DEFENDANTS' SECOND REQUESTS FOR ADMISSIONS
Ricoh v. Aeroflex C03-04669 MJJ (EMC)

1 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms "the terms of
2 Ricky Darwin participated in the development of the software that was delivered to Ricoh in or about
3 August of 1987 pursuant to the terms of KBSC 000001- 0000003" as being vague and ambiguous as to
4 what the defendants may mean by the terms, and therefore denies same.

5 **Request for Admission No. 166.**

6 Admit that the terms of Stuart Anderson participated in the development of the software that was
7 delivered to Ricoh in or about August of 1987 pursuant to the terms of KBSC 000001- 0000003.

8 **Response:**

9 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms "the terms of
10 Stuart Anderson participated in the development of the software that was delivered to Ricoh in or
11 about August of 1987 pursuant to the terms of KBSC 000001- 0000003" as being vague and
12 ambiguous as to what the defendants may mean by the terms, and therefore denies same.

13 **Request for Admission No. 167.**

14 Admit that the terms of Zenji Oka participated in development of the Specification labeled KBSC
15 000009 - 000027.

16 **Response:**

17 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms "the terms of Zenji
18 Oka participated in development of the Specification labeled KBSC 000009 - 000027" as being vague
19 and ambiguous as to what the defendants may mean by the terms, and therefore denies same.

20 **Request for Admission No. 168.**

21 Admit that the terms of Terumi Suehiro participated in development of the Specification labeled KBSC
22 000009 - 000027.

23 **Response:**

24 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms "the terms of
25 Terumi Suehiro participated in development of the Specification labeled KBSC 000009 - 000027" as
26 being vague and ambiguous as to what the defendants may mean by the terms, and therefore denies
27 same.

28 RICOH'S SUPPLEMENTAL RESPONSE TO ASIC DEFENDANTS' SECOND REQUESTS FOR ADMISSIONS
Ricoh v. Aeroflex C03-04669 MJJ (EMC)

1 **Request for Admission No. 169.**

2 Admit that the terms of Tooru Ozeki participated in development of the Specification labeled KBSC
3 000009 - 000027.

4 **Response:**

5 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms "the terms of
6 Tooru Ozeki participated in development of the Specification labeled KBSC 000009 - 000027" as
7 being vague and ambiguous as to what the defendants may mean by the terms, and therefore denies
8 same.

9 **Request for Admission No. 170.**

10 Admit that the terms Yoon-Pin Foo participated in development of me Specification labeled KBSC
11 000009 – 000027.

12 **Response:**

13 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms "the terms of
14 Tooru Ozeki participated in development of the Specification labeled KBSC 000009 - 000027" as
15 being vague and ambiguous as to what the defendants may mean by the terms, and therefore denies
16 same.

17 **Request for Admission No. 171.**

18 Admit that the terms of Ricky Darwin participated in development of the Specification labeled KBSC
19 000009 - 000027.

20 **Response:**

21 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms "the terms of
22 Ricky Darwin participated in development of the Specification labeled KBSC 000009 - 000027" as
23 being vague and ambiguous as to what the defendants may mean by the terms, and therefore denies
24 same.

25 **Request for Admission No. 172.**

26 Admit that Foo, Y.P.S. & H. Kobayashi, A Knowledge-Based System/or VLSI Module Selection,
27 IEEE Int'l Conf. Computer Design (ICCD), pp. 184-186 (Oct. 1986). (KBSC000995 - KBSC000995)

28 RICOH'S SUPPLEMENTAL RESPONSE TO ASIC DEFENDANTS' SECOND REQUESTS FOR ADMISSIONS
Ricoh v. Aeroflex C03-04669 MJJ (EMC)

1 discloses a "computer-aided design process for designing an application specific integrated circuit
2 which will perform a desired function."

3 **Response:**

4 Ricoh incorporates by reference objections 1-15. Ricoh objects to the extent that this request seeks
5 expert knowledge or expert opinions. Ricoh states that the quoted term is not used in the specified
6 reference, and therefore denies same.

7 **Request for Admission No. 173.**

8 Admit that Foo, Y.P.S. & H. Kobayashi, A Knowledge-Based System for VLSI Module Selection,
9 IEEE Int'l Conf- Computer Design (ICCD), pp. 184-186 (Oct. 1986). (KBSC000995 - KBSC000995)
10 discloses "storing a set of definitions of architecture independent actions and conditions."

11 **Response:**

12 Ricoh incorporates by reference objections 1-15. Ricoh objects to the extent that this request seeks
13 expert knowledge or expert opinions. Ricoh states that the quoted term is not used in the specified
14 reference, and therefore denies same.

15 **Request for Admission No. 174.**

16 Admit that Foo, Y.P.S. & H. Kobayashi, A Knowledge-Based System for VLSI Module Selection,
17 IEEE Int'l Conf. Computer Design (ICCD), pp. 184-186 (Oct. 1986). (KBSC000995 - KBSC000995)
18 discloses "definitions of architecture independent actions and conditions."

19 **Response:**

20 Ricoh incorporates by reference objections 1-15. Ricoh objects to the extent that this request seeks
21 expert knowledge or expert opinions. Ricoh states that the quoted term is not used in the specified
22 reference, and therefore denies same.

23 **Request for Admission No. 175.**

24 Admit that Foo, Y.P.S. &H. Kobayashi, A Knowledge-Based System for VLSI Module Selection,
25 IEEE Int'l Conf. Computer Design (ICCD), pp. 184-186 (Oct. 1986). (KBSC000995 - KBSC000995)
26 discloses "storing data describing a set of available integrated circuit hardware cells."

27 **Response:**

28 RICOH'S SUPPLEMENTAL RESPONSE TO ASIC DEFENDANTS' SECOND REQUESTS FOR ADMISSIONS
Ricoh v. Aeroflex C03-04669 MJJ (EMC)

1 Ricoh incorporates by reference objections 1-15. Ricoh objects to the extent that this request seeks
2 expert knowledge or expert opinions. Ricoh states that the quoted term is not used in the specified
3 reference, and therefore denies same.

4 **Request for Admission No. 176.**

5 Admit that Foo, Y.P.S. & H. Kobayashi, A Knowledge-Based System for VLSI Module Selection,
6 IEEE Int4 Conf. Computer Design (ICCD), pp. 184-186 (Oct. 1986). (KBSC000995 - KBSC000995)
7 discloses "storing data describing a set of available integrated circuit hardware cells for performing the
8 actions and conditions defined in the stored set."

9 **Response:**

10 Ricoh incorporates by reference objections 1-15. Ricoh objects to the extent that this request seeks
11 expert knowledge or expert opinions. Ricoh states that the quoted term is not used in the specified
12 reference, and therefore denies same.

13 **Request for Admission No. 177.**

14 Admit that Foo, Y.P.S. &H. Kobayashi, A Knowledge-Based System for VLSI Module Selection,
15 IEEE Int'l Conf. Computer Design (ICCD), pp. 184-186(Oct. 1986). (KBSC000995- KBSC000995)
16 discloses "an expert system knowledge base."

17 **Response:**

18 Ricoh incorporates by reference objections 1-15. Ricoh objects to the extent that this request seeks
19 expert knowledge or expert opinions. Ricoh states that the quoted term is not used in the specified
20 reference, and therefore denies same.

21 **Request for Admission No. 178.**

22 Admit that Foo, Y.P.S. & H. Kobayashi, A Knowledge-Based System for VLSI Module Selection,
23 IEEE Int'l Conf. Computer Design (ICCD), pp. 184"186(Oct. 1986). (KBSC000995 - KBSC000995)
24 discloses "a set of rules for selecting hardware cells to perform the actions and conditions."

25 **Response:**

26

27

28 RICOH'S SUPPLEMENTAL RESPONSE TO ASIC DEFENDANTS' SECOND REQUESTS FOR ADMISSIONS
Ricoh v. Aeroflex C03-04669 MJJ (EMC)

1 Ricoh incorporates by reference objections 1-15. Ricoh objects to the extent that this request seeks
2 expert knowledge or expert opinions. Ricoh states that the quoted term is not used in the specified
3 reference, and therefore denies same.

4 **Request for Admission No. 179.**

5 Admit that Foo, Y.P.S. & H. Kobayashi, A Knowledge-Based System/or VLSI Module Selection,
6 IEEE int'l Conf. Computer Design (ICCD), pp. 184-186 (Oct. 1986). (KBSC000995 - KBSC000995)
7 discloses "describing for a proposed application specific integrated circuit a series of architecture
8 independent actions and conditions."

9 **Response:**

10 Ricoh incorporates by reference objections 1-15. Ricoh objects to the extent that this request seeks
11 expert knowledge or expert opinions. Ricoh states that the quoted term is not used in the specified
12 reference, and therefore denies same.

13 **Request for Admission No. 180.**

14 Admit that Foo. Y.P.S. & H. Kobayashi, A Knowledge-Based System for VLSI Module Selection,
15 IEEE Int'1 Conf, Computer Design (ICCD), pp. 1 §4-186 (Oct. 1986). (KBSC000995 - KBSC000995)
16 discloses "specifying for each described action and condition of the series one of said stored definitions
17 which corresponds to the desired action or condition to be performed."

18 **Response:**

19 Ricoh incorporates by reference objections 1-15. Ricoh objects to the extent that this request seeks
20 expert knowledge or expert opinions. Ricoh states that the quoted term is not used in the specified
21 reference, and therefore denies same.

22 **Request for Admission No. 181.**

23 Admit that Foo, Y.P.S. & H. Kobayashi, A Knowledge-Based System for VLSI Module Selection,
24 IEEE Int'l Conf. Computer Design (ICCD), pp. 184-186 (Oct. 1986). (KBSC000995 - KBSC000995)
25 discloses "specifying for each described action and condition of the series one of said stored definitions
26 which corresponds to the desired action or condition to be performed."

27 **Response:**

28 RICOH'S SUPPLEMENTAL RESPONSE TO ASIC DEFENDANTS' SECOND REQUESTS FOR ADMISSIONS
Ricoh v. Aeroflex C03-04669 MJJ (EMC)

1 Ricoh incorporates by reference objections 1-15. Ricoh objects to the extent that this request seeks
2 expert knowledge or expert opinions. Ricoh states that the quoted term is not used in the specified
3 reference, and therefore denies same.

4 **Request for Admission No. 182.**

5 Admit that Foo, Y.P.S. & H. Kobayashi, A Knowledge-Based System for VLSI Module Selection,
6 IEEE Int'l Conf. Computer Design (ICCD), pp. 184-186 (Oct. 1986). (KBSC000995 - KBSC000995)
7 discloses "selecting from said stored data for each of the specified definitions a corresponding
8 integrated circuit hardware cell for performing the desired function of the application specific
9 integrated circuit."

10 **Response:**

11 Ricoh incorporates by reference objections 1-15. Ricoh objects to the extent that this request seeks
12 expert knowledge or expert opinions. Ricoh states that the quoted term is not used in the specified
13 reference, and therefore denies same.

14 **Request for Admission No. 183.**

15 Admit that Foo, Y.P.S. & H. Kobayashi, A Knowledge-Based System _ for VLSI Module Selection,
16 IEEE Int'l Conf. Computer Design (ICCD), pp. 184-186 (Oct. 1986). (KBSC000995 - KBSC000995)
17 discloses "applying to the specified definition of the action or condition to be performed, a set of cell
18 selection rules stored in said expert system knowledge base and generating for the selected integrated
19 circuit hardware cells, a netlist defining the hardware cells which are needed to perform the desired
20 function of the integrated circuit."

21 **Response:**

22 Ricoh incorporates by reference objections 1-15. Ricoh objects to the extent that this request seeks
23 expert knowledge or expert opinions. Ricoh states that the quoted term is not used in the specified
24 reference, and therefore denies same.

25 **Request for Admission No. 184.**

26 Admit that Foo, Y.P.S., .& H. Kobayashi, A Knowledge-Based System for VLSI Module Selection,
27 IEEE Int'l Conf. Computer Design (ICCD), pp. J 84-186 (Oct. 1986). (KBSC000995 - KBSC000995)

28 RICOH'S SUPPLEMENTAL RESPONSE TO ASIC DEFENDANTS' SECOND REQUESTS FOR ADMISSIONS
Ricoh v. Aeroflex C03-04669 MJJ (EMC)

1 discloses "selecting from said stored data for each of the specified definitions a corresponding
2 integrated circuit hardware cell for performing the desired function of the application specific
3 integrated circuit, said step of selecting a hardware cell comprising applying to the specified definition
4 of the action or condition to be performed, a set of cell selection rules stored in said expert system
5 knowledge base and generating for the selected integrated circuit hardware cells, a netlist defining the
6 hardware cells which are needed to perform the desired function of the integrated circuit.

7 **Response:**

8 Ricoh incorporates by reference objections 1-15. Ricoh objects to the extent that this request seeks
9 expert knowledge or expert opinions. Ricoh states that the quoted term is not used in the specified
10 reference, and therefore denies same.

11 **Request for Admission No. 185.**

12 Admit that T.J. Kowalski, et al., The VLSI Design Automation Assistant: From Algorithms to Silicon,
13 IEEE Design & Test 33-43 (1985) (DEF018108-DEF018118) discloses a "computer-aided design
14 process for designing an application specific integrated circuit which will perform a desired function."

15 **Response:**

16 Ricoh incorporates by reference objections 1-15. Ricoh objects to the extent that this request seeks
17 expert knowledge or expert opinions. Ricoh states that the quoted term is not used in the specified
18 reference, and therefore denies same.

19 **Request for Admission No. 186.**

20 Admit that T.J. Kowalski, et al., The VLSI Design Automation Assistant: From Algorithms to Silicon,
21 IEEE Design & Test 33-43 (1985) (DEF018108-DEF018118) discloses "storing a set of definitions of
22 architecture independent actions and conditions."

23 **Response:**

24 Ricoh incorporates by reference objections 1-15. Ricoh objects to the extent that this request seeks
25 expert knowledge or expert opinions. Ricoh states that the quoted term is not used in the specified
26 reference, and therefore denies same.

27 **Request for Admission No. 187.**

28 RICOH'S SUPPLEMENTAL RESPONSE TO ASIC DEFENDANTS' SECOND REQUESTS FOR ADMISSIONS
Ricoh v. Aeroflex C03-04669 MJJ (EMC)

1 Admit that T.J. Kowalski, et al., The VLSI Design Automation Assistant: From Algorithms to Silicon,
2 IEEE Design & Test 33-43 (1985) (DEF018108-DEF018118) discloses "definitions of architecture
3 independent actions and conditions."

4 **Response:**

5 Ricoh incorporates by reference objections 1-15. Ricoh objects to the extent that this request seeks
6 expert knowledge or expert opinions. Ricoh states that the quoted term is not used in the specified
7 reference, and therefore denies same.

8 **Request for Admission No. 188.**

9 Admit that T.J. Kowalski, et al., The VLSI Design Automation Assistant: From Algorithms to Silicon,
10 IEEE Design & Test 33-43 (1985) (DEF018108-DEF018118) discloses "storing data describing a set
11 of available integrated circuit hardware cells,"

12 **Response:**

13 Ricoh incorporates by reference objections 1-15. Ricoh objects to the extent that this request seeks
14 expert knowledge or expert opinions. Ricoh states that the quoted term is not used in the specified
15 reference, and therefore denies same.

16 **Request for Admission No. 189.**

17 Admit that T.J. Kowalski, et al.. The VLSI Design Automation Assistant: From Algorithms to Silicon,
18 IEEE Design & Test 33-43 (1985) (DEF018108-DEF018118) discloses "storing data describing a set
19 of available integrated circuit hardware cells for performing the actions and conditions defined in the
20 stored set."

21 **Response:**

22 Ricoh incorporates by reference objections 1-15. Ricoh objects to the extent that this request seeks
23 expert knowledge or expert opinions. Ricoh states that the quoted term is not used in the specified
24 reference, and therefore denies same.

25 **Request for Admission No. 190.**

26

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28 RICOH'S SUPPLEMENTAL RESPONSE TO ASIC DEFENDANTS' SECOND REQUESTS FOR ADMISSIONS
Ricoh v. Aeroflex C03-04669 MJJ (EMC)

1 Admit that T.J. Kowalski, et al., The VLSI Design Automation Assistant: From Algorithms to Silicon,
2 IEEE Design & Test 33-43 (1985) (DEF018108-DEF018118) discloses "an expert system knowledge
3 base."

4 **Response:**

5 Ricoh incorporates by reference objections 1-15. Ricoh objects to the extent that this request seeks
6 expert knowledge or expert opinions. Ricoh states that the quoted term is not used in the specified
7 reference, and therefore denies same.

8 **Request for Admission No. 191.**

9 Admit T.J. Kowalski, et al.. The VLSI Design Automation Assistant: From Algorithms to Silicon,
10 IEEE Design & Test 33-43 (1985) (DEF018108-DEF018118) discloses "a set of rules for selecting
11 hardware cells to perform the actions and conditions."

12 **Response:**

13 Ricoh incorporates by reference objections 1-15. Ricoh objects to the extent that this request seeks
14 expert knowledge or expert opinions. Ricoh states that the quoted term is not used in the specified
15 reference, and therefore denies same.

16 **Request for Admission No. 192.**

17 Admit that T.J. Kowalski, et al., The VLSI Design Automation Assistant: From Algorithms to Silicon,
18 IEEE Design & Test 33-43 (1985) (DEF018108-DEF018118) discloses "storing in an expert system
19 knowledge base a set of rules for selecting hardware cells to perform the actions and conditions."

20 **Response:**

21 Ricoh incorporates by reference objections 1-15. Ricoh objects to the extent that this request seeks
22 expert knowledge or expert opinions. Ricoh states that the quoted term is not used in the specified
23 reference, and therefore denies same.

24 **Request for Admission No. 193.**

25 Admit that T.J., Kowalski, et al., The VLSI Design Automation Assistant: From Algorithms to Silicon,
26 IEEE Design & Test 33-43 (1985) (DEF018108-DEF018118) discloses "describing for a proposed
27 application specific integrated circuit a series of architecture independent actions and conditions."

28 RICOH'S SUPPLEMENTAL RESPONSE TO ASIC DEFENDANTS' SECOND REQUESTS FOR ADMISSIONS
Ricoh v. Aeroflex C03-04669 MJJ (EMC)

1 **Response:**

2 Ricoh incorporates by reference objections 1-15. Ricoh objects to the extent that this request seeks
3 expert knowledge or expert opinions. Ricoh states that the quoted term is not used in the specified
4 reference, and therefore denies same.

5 **Request for Admission No. 194.**

6 Admit that T.J., Kowalski, et al.. The VLSI Design Automation Assistant: From Algorithms to Silicon,
7 IEEE Design & Test 33-43 (1985) (DEF018108-DEF018118) discloses "specifying for each described
8 action and condition of the series one of said stored definitions which corresponds to the desired action
9 or condition to be performed."

10 **Response:**

11 Ricoh incorporates by reference objections 1-15. Ricoh objects to the extent that this request seeks
12 expert knowledge or expert opinions. Ricoh states that the quoted term is not used in the specified
13 reference, and therefore denies same.

14 **Request for Admission No. 195.**

15 Admit that T.J. Kowalski, et al., The VLSI Design Automation Assistant: From Algorithms to Silicon,
16 IEEE Design & Test 33-43 (1985) (DEF018108-DEF018118) discloses "specifying for each described
17 action and condition of the series one of said stored definitions which corresponds to the desired action
18 or condition to be performed."

19 **Response:**

20 Ricoh incorporates by reference objections 1-15. Ricoh objects to the extent that this request seeks
21 expert knowledge or expert opinions. Ricoh states that the quoted term is not used in the specified
22 reference, and therefore denies same.

23 **Request for Admission No. 196.**

24 Admit that T.J. Kowalski, et al., The VLSI Design Automation Assistant: From Algorithms to Silicon,
25 IEEE Design & Test 33-43 (1985) (DEF018108-DEF018118) discloses "selecting from said stored
26 data for each of the specified definitions a corresponding integrated circuit hardware cell for
27 performing the desired function of the application specific integrated circuit."

28 RICOH'S SUPPLEMENTAL RESPONSE TO ASIC DEFENDANTS' SECOND REQUESTS FOR ADMISSIONS
Ricoh v. Aeroflex C03-04669 MJJ (EMC)

1 **Response:**

2 Ricoh incorporates by reference objections 1-15. Ricoh objects to the extent that this request seeks
3 expert knowledge or expert opinions. Ricoh states that the quoted term is not used in the specified
4 reference, and therefore denies same.

5 **Request for Admission No. 197.**

6 Admit T.J. Kowalski, et al.. The VLSI Design Automation Assistant: From Algorithms to Silicon,
7 IEEE Design & Test 33-43 (1985) (DEF018108-DEF018118) discloses "applying to the specified
8 definition of the action or condition to be performed, a set of cell selection rules stored in said expert
9 system knowledge base and generating for the selected integrated circuit hardware cells, a netlist
10 defining the hardware cells which are needed to perform the desired function of the integrated circuit."

11 **Response:**

12 Ricoh incorporates by reference objections 1-15. Ricoh objects to the extent that this request seeks
13 expert knowledge or expert opinions. Ricoh states that the quoted term is not used in the specified
14 reference, and therefore denies same.

15 **Request for Admission No. 198.**

16 Admit that T.J. Kowalski, et al., The VLSI Design Automation Assistant: From Algorithms to Silicon,
17 IEEE Design & Test 33-43 (1985) (DEF018108-DEF018118) discloses "selecting from said stored
18 data for each of the specified definitions a corresponding integrated circuit hardware cell for
19 performing the desired function of the application specific integrated circuit, said step of selecting a
20 hardware cell comprising applying to the specified definition of the action or condition to be
21 performed, a set of cell selection rules stored in said expert system knowledge base and generating for
22 the selected integrated circuit hardware cells, a netlist defining the hardware cells which are needed to
23 perform the desired function of the integrated circuit,"

24 **Response:**

25 Ricoh incorporates by reference objections 1-15. Ricoh objects to the extent that this request seeks
26 expert knowledge or expert opinions. Ricoh states that the quoted term is not used in the specified
27 reference, and therefore denies same.

28 RICOH'S SUPPLEMENTAL RESPONSE TO ASIC DEFENDANTS' SECOND REQUESTS FOR ADMISSIONS
Ricoh v. Aeroflex C03-04669 MJJ (EMC)

1 **Request for Admission No. 199.**

2 Admit that T.J. Kowalski, et al, The VLSI Design Automation Assistant: From Algorithms to Silicon,
3 IEEE Design & Test 33-43 (1985) (DEF018108-DEF018118) discloses "selecting from said stored
4 data for each of the specified definitions a corresponding integrated circuit hardware cell for
5 performing the desired function of the application specific integrated circuit, said step of selecting a
6 hardware cell comprising applying to the specified definition of the action or condition to be
7 performed, a set of cell selection rules stored in said expert system knowledge base and generating for
8 the selected integrated circuit hardware cells, a netlist defining the hardware cells which are needed to
9 perform the desired function of the integrated circuit and the interconnections therefor.'

10 **Response:**

11 Ricoh incorporates by reference objections 1-15. Ricoh objects to the extent that this request seeks
12 expert knowledge or expert opinions. Ricoh states that the quoted term is not used in the specified
13 reference, and therefore denies same.

14 **Request for Admission No. 200.**

15 Admit that Thaddeus Julius Kowalski, The VLSI Design Automation Assistant: A Knowledge-Based
16 Expert System, Carnegie-Mellon University PhD Thesis, April 1984 discloses a "computer-aided
17 design process for designing an application specific integrated circuit which will perform a desired
18 function."

19 **Response:**

20 Ricoh incorporates by reference objections 1-15. Ricoh objects to the extent that this request seeks
21 expert knowledge or expert opinions. Ricoh states that the quoted term is not used in the specified
22 reference, and therefore denies same.

23 **Request for Admission No. 201.**

24 Admit that Thaddeus Julius Kowalski, The VLSI Design Automation Assistant: A Knowledge-Based
25 Expert System, Carnegie-Mellon University PhD Thesis, April 1984 discloses "storing a set of
26 definitions of architecture independent actions and conditions."

27 **Response:**

28 RICOH'S SUPPLEMENTAL RESPONSE TO ASIC DEFENDANTS' SECOND REQUESTS FOR ADMISSIONS
Ricoh v. Aeroflex C03-04669 MJJ (EMC)

1 Ricoh incorporates by reference objections 1-15. Ricoh objects to the extent that this request seeks
2 expert knowledge or expert opinions. Ricoh states that the quoted term is not used in the specified
3 reference, and therefore denies same.

4 **Request for Admission No. 202.**

5 Admit that Thaddeus Julius Kowalski, The VLSI Design Automation Assistant: A Knowledge-Based
6 Expert System, Carnegie-Mellon University PhD Thesis, April 1984 discloses "definitions of
7 architecture independent actions and conditions."

8 **Response:**

9 Ricoh incorporates by reference objections 1-15. Ricoh objects to the extent that this request seeks
10 expert knowledge or expert opinions. Ricoh states that the quoted term is not used in the specified
11 reference, and therefore denies same.

12 **Request for Admission No. 203.**

13 Admit that Thaddeus Julius Kowalski, The VLSI Design Automation Assistant: A Knowledge-Based
14 Expert System, Carnegie-Mellon University PhD Thesis, April 1984 discloses "storing data describing
15 a set of available integrated circuit hardware cells,"

16 **Response:**

17 Ricoh incorporates by reference objections 1-15. Ricoh objects to the extent that this request seeks
18 expert knowledge or expert opinions. Ricoh states that the quoted term is not used in the specified
19 reference, and therefore denies same.

20 **Request for Admission No. 204.**

21 Admit that Thaddeus Julius Kowalski, The VLSI Design Automation Assistant: A Knowledge-Based
22 Expert System, Mellon-Mellon University PhD Thesis, April 1984 discloses "storing data describing a
23 set of available integrated circuit hardware cells for performing the actions and conditions defined in
24 the stored set."

25 **Response:**

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28 RICOH'S SUPPLEMENTAL RESPONSE TO ASIC DEFENDANTS' SECOND REQUESTS FOR ADMISSIONS
Ricoh v. Aeroflex C03-04669 MJJ (EMC)

1 Ricoh incorporates by reference objections 1-15. Ricoh objects to the extent that this request seeks
2 expert knowledge or expert opinions. Ricoh states that the quoted term is not used in the specified
3 reference, and therefore denies same.

4 **Request for Admission No. 205.**

5 Admit that Thaddeus Julius Kowalski, The VLSI Design Automation Assistant: A Knowledge-Based
6 Expert System, Mellon-Mellon University PhD Thesis, April 1984 discloses "an expert system
7 knowledge base."

8 **Response:**

9 Ricoh incorporates by reference objections 1-15. Ricoh objects to the extent that this request seeks
10 expert knowledge or expert opinions. Ricoh states that the quoted term is not used in the specified
11 reference, and therefore denies same.

12 **Request for Admission No. 206.**

13 Admit that Thaddeus Julius K-Kowalski, The VLSI Design Automation Assistant: A Knowledge-
14 Based Expert System, Mellon-Mellon University PhD Thesis, April 1984 discloses "a set of rules for
15 selecting hardware cells to perform the actions and conditions."

16 **Response:**

17 Ricoh incorporates by reference objections 1-15. Ricoh objects to the extent that this request seeks
18 expert knowledge or expert opinions. Ricoh states that the quoted term is not used in the specified
19 reference, and therefore denies same.

20 **Request for Admission No. 207.**

21 Admit that Thaddeus Julius Kowalski, The VLSI Design Automation Assistant: A Knowledge-Based
22 Expert System, Mellon-Mellon University PhD Thesis, April 1984 discloses "storing in an expert
23 system knowledge base a set of rules for selecting hardware cells to perform the actions and
24 conditions."

25 **Response:**

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28 RICOH'S SUPPLEMENTAL RESPONSE TO ASIC DEFENDANTS' SECOND REQUESTS FOR ADMISSIONS
Ricoh v. Aeroflex C03-04669 MJJ (EMC)

1 Ricoh incorporates by reference objections 1-15. Ricoh objects to the extent that this request seeks
2 expert knowledge or expert opinions. Ricoh states that the quoted term is not used in the specified
3 reference, and therefore denies same.

4 **Request for Admission No. 208.**

5 Admit that Thaddeus Julius Kowalski, The VLSI Design Automation Assistant: A Knowledge-Based
6 Expert System, Mellon-Mellon University PhD Thesis, April 1984 discloses "describing for a
7 proposed application specific integrated circuit a series of architecture independent actions and
8 conditions."

9 **Response:**

10 Ricoh incorporates by reference objections 1-15. Ricoh objects to the extent that this request seeks
11 expert knowledge or expert opinions. Ricoh states that the quoted term is not used in the specified
12 reference, and therefore denies same.

13 **Request for Admission No. 209.**

14 Admit that Thaddeus Julius Kowalski, The VLSI Design Automation Assistant: A Knowledge-Based
15 Expert System, Mellon-Mellon University PhD Thesis, April 1984 discloses "specifying for each
16 described action and condition of the series one of said stored definitions which corresponds to the
17 desired action or condition to be performed."

18 **Response:**

19 Ricoh incorporates by reference objections 1-15. Ricoh objects to the extent that this request seeks
20 expert knowledge or expert opinions. Ricoh states that the quoted term is not used in the specified
21 reference, and therefore denies same.

22 **Request for Admission No. 210.**

23 Admit that Thaddeus Julius Kowalski, The VLSI Design Automation Assistant: A Knowledge-Based
24 Expert System, Mellon-Mellon University PhD Thesis, April 1984 discloses "specifying for each
25 described action and condition of the series one of said stored definitions which corresponds to the
26 desired action or condition to be performed."

27 **Response:**

28 RICOH'S SUPPLEMENTAL RESPONSE TO ASIC DEFENDANTS' SECOND REQUESTS FOR ADMISSIONS
Ricoh v. Aeroflex C03-04669 MJJ (EMC)

1 Ricoh incorporates by reference objections 1-15. Ricoh objects to the extent that this request seeks
2 expert knowledge or expert opinions. Ricoh states that the quoted term is not used in the specified
3 reference, and therefore denies same.

4 **Request for Admission No. 211.**

5 Admit that Thaddeus Julius Kowalski, The VLSI Design Automation Assistant: A Knowledge-Based
6 Expert System, Mellon-Mellon University PhD Thesis, April 1984 discloses "selecting from said
7 stored data for each of the specified definitions a corresponding integrated circuit hardware cell for
8 performing the desired function of the application specific integrated circuit."

9 **Response:**

10 Ricoh incorporates by reference objections 1-15. Ricoh objects to the extent that this request seeks
11 expert knowledge or expert opinions. Ricoh states that the quoted term is not used in the specified
12 reference, and therefore denies same.

13 **Request for Admission No. 212.**

14 Admit Thaddeus Julius Kowalski, The VLSI Design Automation Assistant: A Knowledge-Based
15 Expert System, Carnegie-Mellon University PhD Thesis, April 1984 discloses "applying to the
16 specified definition of the action or condition to be performed, a set of cell selection rules stored in
17 said expert system knowledge base and generating for the selected integrated circuit hardware cells, a
18 netlist defining the hardware cells which are needed to perform the desired function of the integrated
19 circuit."

20 **Response:**

21 Ricoh incorporates by reference objections 1-15. Ricoh objects to the extent that this request seeks
22 expert knowledge or expert opinions. Ricoh states that the quoted term is not used in the specified
23 reference, and therefore denies same.

24 **Request for Admission No. 213.**

25 Admit that Thaddeus Julius Kowalski, The VLSI Design Automation Assistant: A Knowledge-Based
26 Expert System, Carnegie-Mellon University PhD Thesis, April 1984 discloses "selecting from said
27 stored data for each of the specified definitions a corresponding integrated circuit hardware cell for

1 performing the desired function of the application specific integrated circuit, said step of selecting a
2 hardware cell comprising applying to the specified definition of the action or condition to be
3 performed, a set of cell selection rules stored in said expert system knowledge base and generating for
4 the selected integrated circuit hardware cells, a netlist defining the hardware cells which are needed to
5 perform the desired function of the integrated circuit."

6 **Response:**

7 Ricoh incorporates by reference objections 1-15. Ricoh objects to the extent that this request seeks
8 expert knowledge or expert opinions. Ricoh states that the quoted term is not used in the specified
9 reference, and therefore denies same.

10 **Request for Admission No. 214.**

11 Admit that Zenji Oka should have been identified as a named inventor of US Patent 4,922,432.

12 **Response:**

13 Ricoh incorporates by reference objections 1-15. Otherwise, denied.

14 **Request for Admission No. 215.**

15 Admit that Turumi Suehiro should have been identified as a named inventor of US Patent No.
16 4,922,432.

17 **Response:**

18 Ricoh incorporates by reference objections 1-15. Otherwise, denied.

19 **Request for Admission No. 216.**

20 Admit that Tooru Ozeki should have been identified as a named inventor US Patent No. 4,922,432.

21 **Response:**

22 Ricoh incorporates by reference objections 1-15. Otherwise, denied.

23 **Request for Admission No. 217.**

24 Admit that Yoon-Pin Foo should have been identified as named inventor of US Patent No. 4,922,432.

25 **Response:**

26 Ricoh incorporates by reference objections 1-15. Otherwise, denied.

27 **Request for Admission No. 218.**

28 RICOH'S SUPPLEMENTAL RESPONSE TO ASIC DEFENDANTS' SECOND REQUESTS FOR ADMISSIONS
Ricoh v. Aeroflex C03-04669 MJJ (EMC)

1 Admit that US Patent No. 4,703,435 discloses a "computer-aided design process for designing an
2 application specific integrated circuit which will perform a desired function."

3 **Response:**

4 Ricoh incorporates by reference objections 1-15. Ricoh objects to the extent that this request seeks
5 expert knowledge or expert opinions. Ricoh states that the quoted term is not used in the specified
6 reference, and therefore denies same.

7 **Request for Admission No. 219.**

8 Admit that US Patent No. 4,703,435 discloses "storing a set of definitions of architecture independent
9 actions and conditions."

10 **Response:**

11 Ricoh incorporates by reference objections 1-15. Ricoh objects to the extent that this request seeks
12 expert knowledge or expert opinions. Ricoh states that the quoted term is not used in the specified
13 reference, and therefore denies same.

14 **Request for Admission No. 220.**

15 Admit that US Patent No. 4,703,435 discloses "definitions of architecture independent actions and
16 conditions."

17 **Response:**

18 Ricoh incorporates by reference objections 1-15. Ricoh objects to the extent that this request seeks
19 expert knowledge or expert opinions. Ricoh states that the quoted term is not used in the specified
20 reference, and therefore denies same.

21 **Request for Admission No. 221.**

22 Admit that US Patent No. 4,703,435 discloses "storing data describing a set of available integrated
23 circuit hardware cells."

24 **Response:**

25 Ricoh incorporates by reference objections 1-15. Ricoh objects to the extent that this request seeks
26 expert knowledge or expert opinions. Ricoh states that the quoted term is not used in the specified
27 reference, and therefore denies same.

28 RICOH'S SUPPLEMENTAL RESPONSE TO ASIC DEFENDANTS' SECOND REQUESTS FOR ADMISSIONS
Ricoh v. Aeroflex C03-04669 MJJ (EMC)

1 **Request for Admission No. 222.**

2 Admit that US Patent No. 4,703,435 discloses "storing data describing a set of available integrated
3 circuit hardware cells for performing the actions and conditions defined in the stored set."

4 **Response:**

5 Ricoh incorporates by reference objections 1-15. Ricoh objects to the extent that this request seeks
6 expert knowledge or expert opinions. Ricoh states that the quoted term is not used in the specified
7 reference, and therefore denies same.

8 **Request for Admission No. 223.**

9 Admit that US Patent No. 4,703,435 discloses "an expert system knowledge base."

10 **Response:**

11 Ricoh incorporates by reference objections 1-15. Ricoh objects to the extent that this request seeks
12 expert knowledge or expert opinions. Ricoh states that the quoted term is not used in the specified
13 reference, and therefore denies same.

14 **Request for Admission No. 224.**

15 Admit that US Patent No. 4,703,435 discloses "a set of rules for selecting hardware cells to perform the
16 actions and conditions."

17 **Response:**

18 Ricoh incorporates by reference objections 1-15. Ricoh objects to the extent that this request seeks
19 expert knowledge or expert opinions. Ricoh states that the quoted term is not used in the specified
20 reference, and therefore denies same.

21 **Request for Admission No. 225.**

22 Admit that US Patent No. 4,703,435 discloses "storing in an expert system knowledge base a set of
23 rules for selecting hardware cells to perform the actions and conditions."

24 **Response:**

25 Ricoh incorporates by reference objections 1-15. Ricoh objects to the extent that this request seeks
26 expert knowledge or expert opinions. Ricoh states that the quoted term is not used in the specified
27 reference, and therefore denies same.

28 RICOH'S SUPPLEMENTAL RESPONSE TO ASIC DEFENDANTS' SECOND REQUESTS FOR ADMISSIONS
Ricoh v. Aeroflex C03-04669 MJJ (EMC)

1 **Request for Admission No. 226.**

2 Admit that US Patent No. 4,703,435 discloses "describing for a proposed application specific
3 integrated circuit a series of architecture independent actions and conditions."

4 **Response:**

5 Ricoh incorporates by reference objections 1-15. Ricoh objects to the extent that this request seeks
6 expert knowledge or expert opinions. Ricoh states that the quoted term is not used in the specified
7 reference, and therefore denies same.

8 **Request for Admission No. 227.**

9 Admit that US Patent No. 4,703,435 discloses "specifying for each described action and condition of
10 the series one of said stored definitions which corresponds to the desired action or condition to be
11 performed."

12 **Response:**

13 Ricoh incorporates by reference objections 1-15. Ricoh objects to the extent that this request seeks
14 expert knowledge or expert opinions. Ricoh states that the quoted term is not used in the specified
15 reference, and therefore denies same.

16 **Request for Admission No. 228.**

17 Admit that US Patent No. 4,703,435 discloses "specifying for each described action and condition of
18 the series one of said stored definitions which corresponds to me desired action or condition to be
19 performed."

20 **Response:**

21 Ricoh incorporates by reference objections 1-15. Ricoh objects to the extent that this request seeks
22 expert knowledge or expert opinions. Ricoh states that the quoted term is not used in the specified
23 reference, and therefore denies same.

24 **Request for Admission No. 229.**

25 Admit that US Patent No. 4,703,435 discloses "selecting from said stored data for each of the specified
26 definitions a corresponding integrated circuit hardware cell for performing the desired function of the
27 application specific integrated circuit."

28 RICOH'S SUPPLEMENTAL RESPONSE TO ASIC DEFENDANTS' SECOND REQUESTS FOR ADMISSIONS
Ricoh v. Aeroflex C03-04669 MJJ (EMC)

1 **Response:**

2 Ricoh incorporates by reference objections 1-15. Ricoh objects to the extent that this request seeks
3 expert knowledge or expert opinions. Ricoh states that the quoted term is not used in the specified
4 reference, and therefore denies same.

5 **Request for Admission No. 230.**

6 Admit US Patent No. 4,703,435 discloses "applying to the specified definition of the action or
7 condition to be performed, a set of cell selection rules stored in said expert system knowledge base and
8 generating for the selected integrated circuit hardware cells, a netlist defining the hardware cells which
9 are needed to perform me desired function of the integrated circuit."

10 **Response:**

11 Ricoh incorporates by reference objections 1-15. Ricoh objects to the extent that this request seeks
12 expert knowledge or expert opinions. Ricoh states that the quoted term is not used in the specified
13 reference, and therefore denies same.

14 **Request for Admission No. 231.**

15 Admit that US Patent No. 4,703,435 discloses "selecting from said stored data for each of the specified
16 definitions a corresponding integrated circuit hardware cell for performing the desired function of the
17 application specific integrated circuit, said step of selecting a hardware cell comprising applying to the
18 specified definition of the action or condition to be performed, a set of cell selection rules stored in
19 said expert system knowledge base and generating for the selected integrated circuit hardware cells, a
20 netlist defining the hardware cells which are needed to perform the desired function of the integrated
21 circuit."

22 **Response:**

23 Ricoh incorporates by reference objections 1-15. Ricoh objects to the extent that this request seeks
24 expert knowledge or expert opinions. Ricoh states that the quoted term is not used in the specified
25 reference, and therefore denies same.

26 **Request for Admission No. 232.**

27

28 RICOH'S SUPPLEMENTAL RESPONSE TO ASIC DEFENDANTS' SECOND REQUESTS FOR ADMISSIONS
Ricoh v. Aeroflex C03-04669 MJJ (EMC)

1 Admit that Mitchell, T.M., et al, A Knowledge-Based Approach to Design, IEEE Trans. On Pattern
2 Analysis and Machine Intelligence, Vol. PAMI-7, No. 5, Sept., 1985, pp.502-510 discloses a
3 "computer-aided design process for designing an application specific integrated circuit which will
4 perform a desired function."

5 **Response:**

6 Ricoh incorporates by reference objections 1-15. Ricoh objects to the extent that this request seeks
7 expert knowledge or expert opinions. Ricoh states that the quoted term is not used in the specified
8 reference, and therefore denies same.

9 **Request for Admission No. 233.**

10 Admit that Mitchell, T.M-, et al., A Knowledge-Based Approach to Design, IEEE Trans. On Pattern
11 Analysis and Machine Intelligence, Vol. PAMI-7, No. 5, Sept., 1985. pp. 502-510 discloses "storing a
12 set of definitions of architecture independent actions and conditions."

13 **Response:**

14 Ricoh incorporates by reference objections 1-15. Ricoh objects to the extent that this request seeks
15 expert knowledge or expert opinions. Ricoh states that the quoted term is not used in the specified
16 reference, and therefore denies same.

17 **Request for Admission No. 234.**

18 Admit that Mitchell, T.M., et al., A Knowledge-Based Approach to Design, IEEE Trans. On Pattern
19 Analysis and Machine Intelligence, Vol, PAMI-7, No. 5, Sept., 1985, pp.502-510 discloses "definitions
20 of architecture independent actions and conditions."

21 **Response:**

22 Ricoh incorporates by reference objections 1-15. Ricoh objects to the extent that this request seeks
23 expert knowledge or expert opinions. Ricoh states that the quoted term is not used in the specified
24 reference, and therefore denies same.

25 **Request for Admission No. 235.**

26

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28 RICOH'S SUPPLEMENTAL RESPONSE TO ASIC DEFENDANTS' SECOND REQUESTS FOR ADMISSIONS
Ricoh v. Aeroflex C03-04669 MJJ (EMC)

1 Admit that Mitchell, T.M., et al., A Knowledge-Based Approach to Design, IEEE Trans. On Pattern
2 Analysis and Machine Intelligence, Vol. PAMI-7, No. 5, Sept., 1985, pp.502-510 discloses "storing
3 data describing a set of available integrated circuit hardware cells."

4 **Response:**

5 Ricoh incorporates by reference objections 1-15. Ricoh objects to the extent that this request seeks
6 expert knowledge or expert opinions. Ricoh states that the quoted term is not used in the specified
7 reference, and therefore denies same.

8 **Request for Admission No. 236.**

9 Admit that Mitchell, T.M., et al., A Knowledge-Based Approach to Design, IEEE Trans. On Pattern
10 Analysis and Machine Intelligence, Vol. PAMI-7, No. 5, Sept., 1985, pp.502-510 discloses "storing
11 data describing a set of available integrated circuit hardware cells for performing the actions and
12 conditions defined in the stored set."

13 **Response:**

14 Ricoh incorporates by reference objections 1-15. Ricoh objects to the extent that this request seeks
15 expert knowledge or expert opinions. Ricoh states that the quoted term is not used in the specified
16 reference, and therefore denies same.

17 **Request for Admission No. 237.**

18 Admit that Mitchell, T.M., et al., A Knowledge-Based Approach to Design, IEEE Trans. On Pattern
19 Analysis and Machine Intelligence, Vol. PAMI-7, No. 5, Sept., 1985, pp.502-510 discloses "an expert
20 system knowledge base."

21 **Response:**

22 Ricoh incorporates by reference objections 1-15. Ricoh objects to the extent that this request seeks
23 expert knowledge or expert opinions. Ricoh states that the quoted term is not used in the specified
24 reference, and therefore denies same.

25 **Request for Admission No. 238.**

26

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28 RICOH'S SUPPLEMENTAL RESPONSE TO ASIC DEFENDANTS' SECOND REQUESTS FOR ADMISSIONS
Ricoh v. Aeroflex C03-04669 MJJ (EMC)

1 Admit that Mitchell, T.M., et al., A Knowledge-Based Approach to Design, IEEE Trans. On Pattern
2 Analysis and Machine Intelligence, Vol. PAMI-7, No. 5, Sept., 1985, pp.502-510 discloses "a set of
3 rules for selecting hardware cells to perform the actions and conditions."

4 **Response:**

5 Ricoh incorporates by reference objections 1-15. Ricoh objects to the extent that this request seeks
6 expert knowledge or expert opinions. Ricoh states that the quoted term is not used in the specified
7 reference, and therefore denies same.

8 **Request for Admission No. 239.**

9 Admit that Mitchell, T.M., et al., A Knowledge-Based Approach to Design, IEEE Trans. On Pattern
10 Analysis and Machine Intelligence, Vol. PAMI-7, No. 5, Sept., 1985, pp.502-510 discloses "storing in
11 an expert system knowledge base a set of rules for selecting hardware cells to perform the actions and
12 conditions."

13 **Response:**

14 Ricoh incorporates by reference objections 1-15. Ricoh objects to the extent that this request seeks
15 expert knowledge or expert opinions. Ricoh states that the quoted term is not used in the specified
16 reference, and therefore denies same.

17 **Request for Admission No. 240.**

18 Admit that Mitchell, T.M., et al., A Knowledge-Based Approach to Design, IEEE Trans. On Pattern
19 Analysis and Machine Intelligence, Vol. PAMI-7, No. 5, Sept., 1985, pp.502-510 discloses "describing
20 for a proposed application specific integrated circuit a series of architecture independent actions and
21 conditions."

22 **Response:**

23 Ricoh incorporates by reference objections 1-15. Ricoh objects to the extent that this request seeks
24 expert knowledge or expert opinions. Ricoh states that the quoted term is not used in the specified
25 reference, and therefore denies same.

26 **Request for Admission No. 241.**

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28 RICOH'S SUPPLEMENTAL RESPONSE TO ASIC DEFENDANTS' SECOND REQUESTS FOR ADMISSIONS
Ricoh v. Aeroflex C03-04669 MJJ (EMC)

1 Admit that Mitchell, T.M., et al., A Knowledge-Based Approach to Design, IEEE Trans, On Pattern
2 Analysis and Machine Intelligence, Vol. PAMI-7, No. 5, Sept., 1985, pp.502-510 discloses "specifying
3 for each described action and condition of the series one of said stored definitions which corresponds
4 to the desired action or condition to be performed."

5 **Response:**

6 Ricoh incorporates by reference objections 1-15. Ricoh objects to the extent that this request seeks
7 expert knowledge or expert opinions. Ricoh states that the quoted term is not used in the specified
8 reference, and therefore denies same.

9 **Request for Admission No. 242.**

10 Admit that Mitchell, T.M., et al., A Knowledge-Based Approach to Design, IEEE Trans. On Pattern
11 Analysis and Machine Intelligence, Vol. PAMI-7, No. 5, Sept., 1985, pp.502-510 discloses "specifying
12 for each described action and condition of the series one of said stored definitions which corresponds
13 to the desired action or condition to be performed."

14 **Response:**

15 Ricoh incorporates by reference objections 1-15. Ricoh objects to the extent that this request seeks
16 expert knowledge or expert opinions. Ricoh states that the quoted term is not used in the specified
17 reference, and therefore denies same.

18 **Request for Admission No. 243.**

19 Admit that Mitchell, T.M-, et al., A Knowledge-Based Approach to Design, IEEE Trails. On Pattern
20 Analysis and Machine Intelligence, Vol. PAMI-7, No. 5, Sept., 1985, pp.502-510 discloses "selecting
21 from said stored data for each of the specified definitions a corresponding integrated circuit hardware
22 cell for performing the desired function of the application specific integrated circuit."

23 **Response:**

24 Ricoh incorporates by reference objections 1-15. Ricoh objects to the extent that this request seeks
25 expert knowledge or expert opinions. Ricoh states that the quoted term is not used in the specified
26 reference, and therefore denies same.

27 **Request for Admission No. 244.**

28 RICOH'S SUPPLEMENTAL RESPONSE TO ASIC DEFENDANTS' SECOND REQUESTS FOR ADMISSIONS
Ricoh v. Aeroflex C03-04669 MJJ (EMC)

1 Admit Mitchell, T.M., et al., A Knowledge-Based Approach to Design, IEEE Trans. On Pattern
2 Analysis and Machine Intelligence, Vol. PAMI-7, No. 5, Sept., 1985, pp.502-510 discloses "applying
3 to the specified definition of the action or condition to be performed, a set of cell selection rules stored
4 in said expert system knowledge base and generating for the selected integrated circuit hardware cells,
5 a netlist defining the hardware cells which are needed to perform the desired function of the integrated
6 circuit."

7 **Response:**

8 Ricoh incorporates by reference objections 1-15. Ricoh objects to the extent that this request seeks
9 expert knowledge or expert opinions. Ricoh states that the quoted term is not used in the specified
10 reference, and therefore denies same.

11 **Request for Admission No. 245.**

12 Admit that Mitchell, T.M., et al., A Knowledge-Based Approach to Design, IEEE Trans. On Pattern
13 Analysis and Machine Intelligence, Vol. PAMI-7, No. 5, Sept., 1985, pp.502-510 discloses "selecting
14 from said stored data for each of the specified definitions a corresponding integrated circuit hardware
15 cell for performing the desired function of the application specific integrated circuit, said step of
16 selecting a hardware cell comprising applying to the specified definition of the action or condition to
17 be performed, a set of cell selection rules stored in said expert system knowledge base and generating
18 for the selected integrated circuit hardware cells, a netlist defining the hardware cells which are needed
19 to perform the desired function of the integrated circuit."

20 **Response:**

21 Ricoh incorporates by reference objections 1-15. Ricoh objects to the extent that this request seeks
22 expert knowledge or expert opinions. Ricoh states that the quoted term is not used in the specified
23 reference, and therefore denies same.

24 **Request for Admission No. 246.**

25 Admit that Masahiro Shindo did not participate in the drafting of KBSC 000007- 000027.

26 **Response:**

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28 RICOH'S SUPPLEMENTAL RESPONSE TO ASIC DEFENDANTS' SECOND REQUESTS FOR ADMISSIONS
Ricoh v. Aeroflex C03-04669 MJJ (EMC)

1 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms "participate in the
2 drafting of KBSC 000007- 000027" as being vague and ambiguous as to what the defendants may
3 mean by the terms. For at least those reasons, Ricoh cannot respond to the request, and therefore
4 denies same.

5 **Request for Admission No. 247.**

6 Admit that Masahiro Shindo did not participate in the development of the specification labeled KBSC
7 000007-000027.

8 **Response:**

9 Ricoh incorporates by reference objections 1-15. Ricoh further objects to the terms "did not participate
10 in the development of the specification labeled KBSC 000007-000027" as being vague and ambiguous
11 as to what the defendants may mean by the terms. For at least those reasons, Ricoh cannot respond to
12 the request, and therefore denies same.

13 **Request for Admission No. 248.**

14 Admit that Mitchell, T-M-, et al., A Knowledge-Based Approach to Design, IEEE Workshop on
15 Principles of Knowledge-Based Systems, Dec., 1984, pp.27-34 discloses a "computer- aided design
16 process for designing an application specific integrated circuit which will perform a desired function."

17 **Response:**

18 Ricoh incorporates by reference objections 1-15. Ricoh objects to the extent that this request seeks
19 expert knowledge or expert opinions. Ricoh states that the quoted term is not used in the specified
20 reference, and therefore denies same.

21 **Request for Admission No. 249.**

22 Admit that Mitchell, T.M., et al., A Knowledge-Based Approach to Design, IEEE Workshop on
23 Principles of Knowledge-Based Systems, Dec., 1984, pp.27-34 discloses "storing a set o definitions of
24 architecture independent actions and conditions."

25 **Response:**

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28 RICOH'S SUPPLEMENTAL RESPONSE TO ASIC DEFENDANTS' SECOND REQUESTS FOR ADMISSIONS
Ricoh v. Aeroflex C03-04669 MJJ (EMC)

1 Ricoh incorporates by reference objections 1-15. Ricoh objects to the extent that this request seeks
2 expert knowledge or expert opinions. Ricoh states that the quoted term is not used in the specified
3 reference, and therefore denies same.

4 **Request for Admission No. 250.**

5 Admit that Mitchell, T.M., et al., A Knowledge-Based Approach to Design, IEEE Workshop on
6 Principles of Knowledge-Based Systems, Dec., 1984, pp.27-34 discloses "definitions of architecture
7 independent actions and conditions."

8 **Response:**

9 Ricoh incorporates by reference objections 1-15. Ricoh objects to the extent that this request seeks
10 expert knowledge or expert opinions. Ricoh states that the quoted term is not used in the specified
11 reference, and therefore denies same.

12 **Request for Admission No. 251.**

13 Admit that Mitchell, T.M., et al., A Knowledge-Based Approach to Design, IEEE Workshop on
14 Principles of Knowledge-Based Systems, Dec., 1984, pp.27-34 discloses "storing data describing a set
15 of available integrated circuit hardware cells,"

16 **Response:**

17 Ricoh incorporates by reference objections 1-15. Ricoh objects to the extent that this request seeks
18 expert knowledge or expert opinions. Ricoh states that the quoted term is not used in the specified
19 reference, and therefore denies same.

20 **Request for Admission No. 252.**

21 Admit that Mitchell, T.M., et al., A Knowledge-Based Approach to Design, IEEE Workshop on
22 Principles of Knowledge-Based Systems, Dec., 1984, pp.27-34 discloses "storing data describing a set
23 of available integrated circuit hardware cells for performing the actions and conditions defined in the
24 stored set,"

25 **Response:**

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28 RICOH'S SUPPLEMENTAL RESPONSE TO ASIC DEFENDANTS' SECOND REQUESTS FOR ADMISSIONS
Ricoh v. Aeroflex C03-04669 MJJ (EMC)

1 Ricoh incorporates by reference objections 1-15. Ricoh objects to the extent that this request seeks
2 expert knowledge or expert opinions. Ricoh states that the quoted term is not used in the specified
3 reference, and therefore denies same.

4 **Request for Admission No. 253.**

5 Admit that Mitchell, T.M., et al.. A Knowledge-Based Approach to Design, IEEE Workshop on
6 Principles of Knowledge-Based Systems, Dec., 1984, pp.27-34 discloses "an expert system knowledge
7 base."

8 **Response:**

9 Ricoh incorporates by reference objections 1-15. Ricoh objects to the extent that this request seeks
10 expert knowledge or expert opinions. Ricoh states that the quoted term is not used in the specified
11 reference, and therefore denies same.

12 **Request for Admission No. 254.**

13 Admit that Mitchell, T.M., et al., A Knowledge-Based Approach to Design, IEEE Workshop on
14 Principles of Knowledge-Based Systems, Dec., 1984, pp.27-34 discloses "a set of rules for selecting
15 hardware cells to perform the actions and conditions."

16 **Response:**

17 Ricoh incorporates by reference objections 1-15. Ricoh objects to the extent that this request seeks
18 expert knowledge or expert opinions. Ricoh states that the quoted term is not used in the specified
19 reference, and therefore denies same.

20 **Request for Admission No. 255.**

21 Admit that Mitchell, T.M., et al., A Knowledge-Based Approach to Design, IEEE Workshop on
22 Principles of Knowledge-Based Systems, Dec., 1984, pp.27-34 discloses "storing in an expert system
23 knowledge base a set of rules for selecting hardware cells to perform the actions and conditions."

24 **Response:**

25 Ricoh incorporates by reference objections 1-15. Ricoh objects to the extent that this request seeks
26 expert knowledge or expert opinions. Ricoh states that the quoted term is not used in the specified
27 reference, and therefore denies same.

28 RICOH'S SUPPLEMENTAL RESPONSE TO ASIC DEFENDANTS' SECOND REQUESTS FOR ADMISSIONS
Ricoh v. Aeroflex C03-04669 MJJ (EMC)

1 **Request for Admission No. 256.**

2 Admit that Mitchell, T.M., et al., A Knowledge-Based Approach to Design, IEEE Workshop on
3 Principles of Knowledge-Based Systems, Dec., 1984, pp.27-34 discloses "describing for a proposed
4 application specific integrated circuit a series of architecture independent actions and conditions."

5 **Response:**

6 Ricoh incorporates by reference objections 1-15. Ricoh objects to the extent that this request seeks
7 expert knowledge or expert opinions. Ricoh states that the quoted term is not used in the specified
8 reference, and therefore denies same.

9 **Request for Admission No. 257.**

10 Admit that Mitchell, T.M., et al., A Knowledge-Based Approach to Design, IEEE Workshop on
11 Principles of Knowledge-Based Systems, Dec., 1984, pp.27-34 discloses "specifying for each
12 described action and condition of the series one of said stored definitions which corresponds to the
13 desired action or condition to be performed,"

14 **Response:**

15 Ricoh incorporates by reference objections 1-15. Ricoh objects to the extent that this request seeks
16 expert knowledge or expert opinions. Ricoh states that the quoted term is not used in the specified
17 reference, and therefore denies same.

18 **Request for Admission No. 258.**

19 Admit that Mitchell, T.M., et al., A Knowledge-Based Approach to Design, IEEE Workshop on
20 Principles of Knowledge-Based Systems, Dec., 1984, pp.27-34 discloses "specifying for each
21 described action and condition of the series one of said stored definitions which corresponds to the
22 desired action or condition to be performed."

23 **Response:**

24 Ricoh incorporates by reference objections 1-15. Ricoh objects to the extent that this request seeks
25 expert knowledge or expert opinions. Ricoh states that the quoted term is not used in the specified
26 reference, and therefore denies same.

27 **Request for Admission No. 259.**

28 RICOH'S SUPPLEMENTAL RESPONSE TO ASIC DEFENDANTS' SECOND REQUESTS FOR ADMISSIONS
Ricoh v. Aeroflex C03-04669 MJJ (EMC)

1 Admit that Mitchell, T.M., et al., A Knowledge-Based Approach to Design, IEEE Workshop on
2 Principles of Knowledge-Based Systems, Dec., 1984, pp.27-34 discloses "selecting from said stored
3 data for each of the specified definitions a corresponding integrated circuit hardware cell for
4 performing me desired function of the application specific integrated circuit."

5 **Response:**

6 Ricoh incorporates by reference objections 1-15. Ricoh objects to the extent that this request seeks
7 expert knowledge or expert opinions. Ricoh states that the quoted term is not used in the specified
8 reference, and therefore denies same.

9 **Request for Admission No. 260.**

10 Admit Mitchell, T.M., et al., A Knowledge-Based Approach to Design, IEEE Workshop on Principles
11 of Knowledge-Based Systems, Dec., 1984, pp.27-34 discloses "applying to the specified definition of
12 the action or condition to be performed, a set of cell selection rules stored in said expert system
13 knowledge base and generating for the selected integrated circuit hardware cells, a netlist defining the
14 hardware cells which are needed to perform the desired function of the integrated circuit."

15 **Response:**

16 Ricoh incorporates by reference objections 1-15. Ricoh objects to the extent that this request seeks
17 expert knowledge or expert opinions. Ricoh states that the quoted term is not used in the specified
18 reference, and therefore denies same.

19 **Request for Admission No. 261.**

20 Admit that Mitchell, T.M., et al, A Knowledge-Based Approach to Design, IEEE Workshop on
21 Principles of Knowledge-Based Systems, Dec., 1984, pp.27-34 discloses "selecting from said stored
22 data for each of the specified definitions a corresponding integrated circuit hardware cell for
23 performing the desired function of the application specific integrated circuit, said step of selecting t
24 hardware cell comprising applying to the specified definition of the action or condition to be
25 performed, a set of cell selection rules stored in said expert system knowledge base and generating for
26 the selected integrated circuit hardware cells, a netlist defining the hardware cells which are needed to
27 perform the desired function of the integrated circuit and the interconnections therefor"

28 RICOH'S SUPPLEMENTAL RESPONSE TO ASIC DEFENDANTS' SECOND REQUESTS FOR ADMISSIONS
Ricoh v. Aeroflex C03-04669 MJJ (EMC)

1 **Response:**

2 Ricoh incorporates by reference objections 1-15. Ricoh objects to the extent that this request seeks
3 expert knowledge or expert opinions. Ricoh states that the quoted term is not used in the specified
4 reference, and therefore denies same.

5 **Request for Admission No. 262.**

6 Admit that Kobayashi, H., A Knowledge-Based Approach to VLSI CAD, AM, section RD-3 (1986).
7 (KBSC000995 - KBSC001001) discloses a "computer-aided design process for designing an
8 application specific integrated circuit which will perform a desired function."

9 **Response:**

10 Ricoh incorporates by reference objections 1-15. Ricoh objects to the extent that this request seeks
11 expert knowledge or expert opinions. Ricoh states that the quoted term is not used in the specified
12 reference, and therefore denies same.

13 **Request for Admission No. 263.**

14 Admit that Kobayashi, H., A Knowledge-Based Approach to VLSI CAD, AM, section RD-3 (1986).
15 (KBSC000995 -KBSC001001) discloses "storing a set of definitions of architecture independent
16 actions and conditions."

17 **Response:**

18 Ricoh incorporates by reference objections 1-15. Ricoh objects to the extent that this request seeks
19 expert knowledge or expert opinions. Ricoh states that the quoted term is not used in the specified
20 reference, and therefore denies same.

21 **Request for Admission No. 264.**

22 Admit that Kobayashi, H. ,A Knowledge-Based Approach to VLSI CAD, AM, section RD-3 (1986).
23 (KBSC000995 - KBSC001001) discloses "definitions of architecture independent actions and
24 conditions,"

25 **Response:**

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28 RICOH'S SUPPLEMENTAL RESPONSE TO ASIC DEFENDANTS' SECOND REQUESTS FOR ADMISSIONS
Ricoh v. Aeroflex C03-04669 MJJ (EMC)

1 Ricoh incorporates by reference objections 1-15. Ricoh objects to the extent that this request seeks
2 expert knowledge or expert opinions. Ricoh states that the quoted term is not used in the specified
3 reference, and therefore denies same.

4 **Request for Admission No. 265.**

5 Admit that Kobayashi, H., A Knowledge-Based Approach to VLSI CAD, AM, section RD-3 (1986).
6 (KBSC000995 - KBSC001001) discloses "storing data describing a set of available integrated circuit
7 hardware cells,"

8 **Response:**

9 Ricoh incorporates by reference objections 1-15. Ricoh objects to the extent that this request seeks
10 expert knowledge or expert opinions. Ricoh states that the quoted term is not used in the specified
11 reference, and therefore denies same.

12 **Request for Admission No. 266.**

13 Admit that Kobayashi, H., A Knowledge-Based Approach to VLSI CAD, AM, section RD-3 (1986),
14 (KBSC000995 - KBSC001001) discloses "storing data describing a set of available integrated circuit
15 hardware cells for performing the actions and conditions denned in the stored set."

16 **Response:**

17 Ricoh incorporates by reference objections 1-15. Ricoh objects to the extent that this request seeks
18 expert knowledge or expert opinions. Ricoh states that the quoted term is not used in the specified
19 reference, and therefore denies same.

20 **Request for Admission No. 267.**

21 Admit that Kobayashi, H., A Knowledge-Based Approach to VLSI CAD, AM, section RD-3 (1986).
22 (KBSC000995 - KBSC001001) discloses "an expert system knowledge base."

23 **Response:**

24 Ricoh incorporates by reference objections 1-15. Ricoh objects to the extent that this request seeks
25 expert knowledge or expert opinions. Ricoh states that the quoted term is not used in the specified
26 reference, and therefore denies same.

27 **Request for Admission No. 268.**

28 RICOH'S SUPPLEMENTAL RESPONSE TO ASIC DEFENDANTS' SECOND REQUESTS FOR ADMISSIONS
Ricoh v. Aeroflex C03-04669 MJJ (EMC)

1 Admit that Kobayashi, H., A Knowledge-Based Approach to VLSI CAD, AM, section RD-3 (1986).
2 (KBSC000995 - KBSC001001) discloses "a set of rules for selecting hardware cells to perform the
3 actions and conditions."

4 **Response:**

5 Ricoh incorporates by reference objections 1-15. Ricoh objects to the extent that this request seeks
6 expert knowledge or expert opinions. Ricoh states that the quoted term is not used in the specified
7 reference, and therefore denies same.

8 **Request for Admission No. 269.**

9 Admit Kobayashi, H., A Knowledge-Based Approach to VLSI CAD, AM, section RD-3 (1986).
10 (KBSC000995 - KBSC001001) discloses "storing in an expert system knowledge base a set of rules
11 for selecting hardware cells to perform the actions and conditions,"

12 **Response:**

13 Ricoh incorporates by reference objections 1-15. Ricoh objects to the extent that this request seeks
14 expert knowledge or expert opinions. Ricoh states that the quoted term is not used in the specified
15 reference, and therefore denies same.

16 **Request for Admission No. 270.**

17 Admit that Kobayashi, H., A Knowledge-Based Approach to VLSI CAD, AM, section RD-3 (1986).
18 (KBSC000995 - KBSC001001) discloses "describing for a proposed application specific integrated
19 circuit a series of architecture independent actions and conditions."

20 **Response:**

21 Ricoh incorporates by reference objections 1-15. Ricoh objects to the extent that this request seeks
22 expert knowledge or expert opinions. Ricoh states that the quoted term is not used in the specified
23 reference, and therefore denies same.

24 **Request for Admission No. 271.**

25 Admit that Kobayashi, H., A Knowledge-Based Approach to VLSI CAD, AM, section RD-3 (1986).
26 (KBSC000995 ~ KBSC001001) discloses "specifying for each described action and condition of the

27

28 RICOH'S SUPPLEMENTAL RESPONSE TO ASIC DEFENDANTS' SECOND REQUESTS FOR ADMISSIONS
Ricoh v. Aeroflex C03-04669 MJJ (EMC)

1 series one of said stored definitions which corresponds to the desired action or condition to be
2 performed."

3 **Response:**

4 Ricoh incorporates by reference objections 1-15. Ricoh objects to the extent that this request seeks
5 expert knowledge or expert opinions. Ricoh states that the quoted term is not used in the specified
6 reference, and therefore denies same.

7 **Request for Admission No. 272.**

8 Admit that Kobayashi, H. A Knowledge-Based Approach to VLSI CAD, AM, section RD-3 (1986).
9 (KBSC000995 -KBSC001001) discloses "specifying for each described action and condition of the
10 series one of said stored definitions which corresponds to the desired action or condition to be
11 performed."

12 **Response:**

13 Ricoh incorporates by reference objections 1-15. Ricoh objects to the extent that this request seeks
14 expert knowledge or expert opinions. Ricoh states that the quoted term is not used in the specified
15 reference, and therefore denies same.

16 **Request for Admission No. 273.**

17 Admit that Kobayashi, H., A Knowledge-Based Approach to VLSI CAD, AM, section RD-3 (1986).
18 (KBSC000995 - KBSC001001) discloses "selecting from said stored data for each of the specified
19 definitions a corresponding integrated circuit hardware cell for performing the desired function of the
20 application specific integrated circuit."

21 **Response:**

22 Ricoh incorporates by reference objections 1-15. Ricoh objects to the extent that this request seeks
23 expert knowledge or expert opinions. Ricoh states that the quoted term is not used in the specified
24 reference, and therefore denies same.

25 **Request for Admission No. 274.**

26 Admit Kobayashi, H., A Knowledge-Based Approach to VLSI CAD, AM, section RD-3 (1986).
27 (KBSCQ00995 - KBSC001001) discloses "applying to the specified definition of the action or

28 RICOH'S SUPPLEMENTAL RESPONSE TO ASIC DEFENDANTS' SECOND REQUESTS FOR ADMISSIONS
Ricoh v. Aeroflex C03-04669 MJJ (EMC)

1 condition to be performed, a set of cell selection rules stored in said expert system knowledge base and
 2 generating for the selected integrated circuit hardware cells, a netlist defining the hardware cells
 3 which" are needed to perform the desired function of the integrated circuit."

4 **Response:**

5 Ricoh incorporates by reference objections 1-15. Ricoh objects to the extent that this request seeks
 6 expert knowledge or expert opinions. Ricoh states that the quoted term is not used in the specified
 7 reference, and therefore denies same.

8 As to responses and objections:

9 Dated: June 8, 2006

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**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

RICOH COMPANY, LTD.,)
Plaintiff,) Case No. C-03-4669-MJJ (EMC)
v.)
AEROFLEX ET AL.,) CERTIFICATE OF SERVICE
Defendants.)

I am employed in Washington, District of Columbia. I am over the age of eighteen (18) years and not a party to the within action; my business address is 2101 L Street, NW, Washington, DC, 20037. On June 8, 2006, I served **RICOH'S SUPPLEMENTAL RESPONSE TO ASIC DEFENDANTS' SECOND REQUESTS FOR ADMISSIONS (NOS. 145-274)** on the parties, through their attorneys of record, by sending true copies thereof to the e-mail addresses listed below:

Terry Corbin, Esq.
CorbinT@Howrey.com

Jacky Fink, Esq.
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Denise De Mory, Esq.
DeMoryD@Howrey.com

I declare that I am employed in the office of a member *pro hac vice* of the Bar of this Court at whose direction this service was made.

I declare under penalty of perjury that the foregoing is true and correct. Executed in Washington, D.C. on June 8, 2006.

H. G. W. Tamm

Solomon Seyoum

Exhibit 5

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21 Attorneys for the Plaintiff Ricoh Company, Ltd.

22
**IN THE UNITED STATES DISTRICT COURT
 17 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION**

18 RICOH COMPANY, LTD., 19 vs. 20 AEROFLEX INCORPORATED, et al., 21 . 22	}) CASE NO. C-03-4669-MJJ (EMC) }) }) RICOH'S AMENDED RESPONSES TO }) AEROFLEX COLORADO'S RESTATED FIRST }) SET OF INTERROGATORIES (1-4) }) })
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23 Pursuant to Rules 26 and 36 of the Federal Rules of Civil Procedure, Plaintiff Ricoh
 24 Company, Ltd., ("Ricoh") hereby objects to Defendant Aeroflex Colorado's ("Aeroflex Colorado")
 25 Restated First set of Interrogatories (Nos. 1-4).

26 These responses are based on information reasonably available to Ricoh at the present time.
 27 Ricoh reserves the right to supplement these responses when, and if, additional information becomes
 28 available. Ricoh also reserves the right to object on any ground at any time to such other or

1 supplemental Interrogatories Aeroflex Colorado may propound involving or relating to the subject
2 matter of these Interrogatories.

OBJECTIONS

1. Ricoh objects to all of the Interrogatories to the extent that they seek information or documents protected by the attorney-client privilege, the work product doctrine, and/or any other privilege or immunity. Ricoh does not intend to provide Aeroflex Colorado, Inc. (“Aeroflex Colorado” or “Defendant”) with such protected information. Moreover, any inadvertent disclosure of such information, or any disclosure of documents underlying that information, shall not be deemed a waiver of the attorney-client privilege, the work product doctrine, or any other privilege or immunity.

2. Ricoh objects to all of the Interrogatories to the extent that they seek information that is subject to any protective order, privacy interest, contractual obligation, non-disclosure agreement, confidentiality agreement or other such confidentiality obligation owed to any third party. Without third party permission, Ricoh will not provide such information unless required by the Court.

3. Ricoh objects to all of the Interrogatories to the extent that Aeroflex Colorado is holding itself out as being the same Aeroflex, Inc. and thus Aeroflex, Inc. is not entitled to seek discovery twice.

4. Ricoh objects to all of the Interrogatories to the extent that they seek to impose an obligation of a continuing nature beyond that required by FRCP 26(e).

5. Ricoh objects to all of the Interrogatories to the extent that they seek to impose a premature obligation to provide information in light of Patent Local Rules, including, but not limited to, Patent Local Rule 2-5.

6. Ricoh objects to all of the Interrogatories as overly broad and unduly burdensome to the extent that they seek information beyond what is available from a reasonable search of Ricoh's files likely to contain relevant or responsive documents and a reasonable inquiry of Ricoh's current employees.

7. Ricoh objects to all of the Interrogatories as unduly burdensome to the extent that they seek information that can be determined from a reasonable search of Aeroflex Colorado's own internal files and a reasonable inquiry of Aeroflex Colorado's own employees, as such it would be more convenient, less burdensome, less expensive for Aeroflex Colorado to perform an internal search.

1 8. Ricoh objects to the definition of ““Ricoh,” ‘Plaintiff,’ ‘you,’ and ‘your’“ because the phrase
2 “predecessors in interest” both is vague so as to not be clear and comprehensible and also is overly
3 broad because the phrase purports to include independent third parties (e.g., International Chip
4 Corporation and Knowledge Based Silicon Corporation). In responding to these Interrogatories, Ricoh
5 limits its response to Ricoh Company, Ltd. However, if specifically requested, Ricoh may be willing to
6 provide information relating to the International Chip Corporation and Knowledge Based Silicon
7 Corporation if such information is within Ricoh’s possession, custody and control. Further, with
8 respect to Interrogatories seeking information from individual persons within Ricoh, Ricoh limits its
9 response to current employees. Ricoh objects to all of the Interrogatories as overly broad and unduly
10 burdensome to the extent that they seek information beyond what is available from a reasonable search
11 of Ricoh’s files likely to contain relevant or responsive documents and a reasonable inquiry of Ricoh’s
12 current employees.

13 9. Ricoh objects to all of the Interrogatories as being unduly burdensome because of the number
14 of Interrogatories as calculated by parts and subparts of the interrogatories.

15 10. Ricoh objects to all of the Interrogatories to the extent that the Interrogatory seeks information
16 that is not reasonably calculated to lead to the discovery of admissible evidence.

17 11. Ricoh objects to all of the Interrogatories to the extent that the Interrogatory seeks information
18 that is contentious, and Ricoh has not yet provided its final contentions and responses to contentions.

19 12. In gathering relevant and responsive information, Ricoh has interpreted the Interrogatories
20 utilizing ordinary meanings of words and has expended reasonable efforts to identify information that
21 appears responsive. To the extent that the Interrogatories purport to seek information other than as so
22 interpreted, Ricoh objects on the ground that the Interrogatories are vague, ambiguous and overbroad.

23 13. Discovery and trial preparation in this matter have not been completed. Ricoh is continuing its
24 investigation to obtain information responsive to the Interrogatories. Therefore, all of the following
25 responses are given without prejudice to Ricoh’s right to introduce documents or information
26 discovered or deemed responsive subsequent to the date of these Interrogatories.

27 14. Any statements made herein regarding Ricoh’s intention to provide information or documents
28 responsive to any given Interrogatories does not necessarily indicate or imply the existence of any

1 information or documents responsive thereto. Furthermore, any information provided or referred to
2 herein is not deemed to be a waiver of Ricoh's objections as to the competency, relevance, privilege or
3 admissibility of evidence in this or any subsequent proceeding or trial in this or any other action for
4 any purpose whatsoever. In addition, Ricoh reserves the right to supplement or amend its response to
5 the Interrogatories based upon information, documents, and things it receives during discovery or
6 obtains upon further investigation. Moreover, Ricoh reserves the right to raise any other additional
7 objections in the future.

8 15. Ricoh objects to all of the Requests to the extent that the Request seeks information that is
9 unlimited as to time as being overly broad and burdensome.

RESPONSES

INTERROGATORY NO. 1:

All prior art that Ricoh, KBCS, or the inventors were aware of prior to the filing of the ‘432 Patent, that relates to the invention set forth in the ‘432 patent application.

RESPONSE:

Ricoh objects to this Interrogatory as Aeroflex, Inc. alternatively seeking discovery through Aeroflex Colorado and through itself. Ricoh objects to this Interrogatory as being unduly burdensome because of the excessive number of Interrogatories propounded. Ricoh incorporates by reference objections 1-15. Ricoh additionally objects that the Interrogatory to the extent that it seeks information that is not reasonably calculated to lead to the discovery of admissible evidence. Ricoh further objects to the phrasing of this Interrogatory; it is in fact a document request. Ricoh further objects to the terms “all prior art” and “Ricoh, KBCS, or the inventors were aware of prior to the filing of the ‘432 Patent” as being vague and ambiguous, and therefore unduly burdensome.

However, subject to and without waving the general and foregoing objections, Ricoh interprets this request as seeking relevant prior art material to patentability that was known to Ricoh management and legal department and that related to the prosecution of the '432 patent during the prosecution of the '432 patent. All such prior art so known to Ricoh was disclosed to and/or considered by the patent office. Pursuant to Rule 33(d), further responsive information may be obtained from documents produced by Ricoh. RCL 000064-81, RCL 000085-183, RCL 000186-206, RCL 0000227.

1 **INTERROGATORY NO. 2 :**

2 Identify the location in the Synopsys source code for V-2003.12-SP1 of an expert system
 3 knowledge base, as defined in the Court's April 7, 2005 claim construction order.

4 **RESPONSE:**

5 Ricoh incorporates by reference objections 1-15. Ricoh additionally objects that the
 6 Interrogatory to the extent that it seeks information that is not reasonably calculated to lead to the
 7 discovery of admissible evidence. Subject to the foregoing and general objections, Ricoh further
 8 responds as follows: Because Synopsys never provided a competent Rule 30(b)(6) witness on the
 9 location and operation of "generic operators" in the source code V-2003.12-SP1, Ricoh has to date
 10 been unable to provide any further response beyond what is disclosed in its final infringement
 11 contentions, dated March 24, 2006, as amended and supplemented. Ricoh reserves the right to provide
 12 further information that may be responsive in its expert reports.

13

14 **INTERROGATORY NO. 3 :**

15 Identify all grounds for Ricoh's contention on page 2 in Ricoh's section of the June 8, 2005
 16 Joint Case Management Conference statement that "the activities that infringe certain of the process
 17 claims of the '432 patent involve more than the 'ordinary use'" of any version of Synopsys' Design
 18 Compiler product, or any of the Synopsys products-in-suit, including the identity of such activities and
 19 the documents that support this contention.

20 **RESPONSE:**

21 Ricoh incorporates by reference objections 1-15. Ricoh additionally objects that the
 22 Interrogatory to the extent that it seeks information that is not reasonably calculated to lead to the
 23 discovery of admissible evidence. Ricoh further objects to the terms "all grounds for Ricoh's
 24 contention on page 2 in Ricoh's section of the June 8, 2005 Joint Case Management Conference
 25 statement that "the activities that infringe certain of the process claims of the '432 patent involve more
 26 than the 'ordinary use'" of Design Compiler, or any of the Synopsys products-in-suit, including the
 27 identity of such activities and the documents that support this contention" as being vague and
 28 ambiguous, and therefore unduly burdensome.

1 **INTERROGATORY NO. 4 :**

2 Identify, which, if any, of the following input formats Ricoh intends to claim for purposes of
 3 the lawsuit are architecture independent” inputs as the Court has defined “architecture independent” in
 4 the April 7, 2005 Claim Construction Order

Format	Description	Keyword	Extension
.db	Synopsys internal database format	db	.db
EDIF	Electronic Design Interchange Format (see the EDIF 2 0 0 Interface User Guide)	edif	.edif
equation	Synopsys equation format	equation	.eqn
LSI	LSI Logic Corporation (NDL) netlist format	lsi	.NET
Mentor	Mentor NETED do Format (output only)	mentor	.neted
MIF	Mentor Intermediate Format (input only)	mif	.mif
PLA	Berkeley (Espresso) PLA format	pla	.pla
State table	Synopsys state table format	st	.st
TDL	Tegas Design Language netlist format	tdl	.tdl
Verilog	Verilog Hardware Description Language (see the HDL Compiler Documentation)	verilog	.v
VHDL	VHSIC Hardware Description Language (see the HDL Compiler Documentation)	vhdl	.vhd
XNF	Xilinx netlist format (See the Designer Compiler FPGA User Guide)	xnf	.xnf

19 **RESPONSE:**

20 Ricoh incorporates by reference objections 1-15. Ricoh additionally objects that the
 21 Interrogatory to the extent that it seeks information that is not reasonably calculated to lead to the
 22 discovery of admissible evidence. Ricoh further objects to the terms “Identify, which, if any, of the
 23 following input formats Ricoh intends to claim for purposes of the lawsuit are architecture
 24 independent” inputs as the Court has defined “architecture independent” in the April 7, 2005 Claim
 25 Construction Order...[table]” as being vague and ambiguous, and therefore unduly burdensome.
 26 Without waiving these objections Ricoh incorporates by reference its Final Infringement Contentions
 27 filed March 24, 2006 and any supplemental contentions and expert reports and testimony.

1
2 Dated: June 8, 2006
3

4 Jeffrey B. Demain, State Bar No. 126715
5 Jonathan Weissglass, State Bar No. 185008
6 Altshuler, Berzon, Nussbaum, Rubin &
7 Demain
8 177 Post Street, Suite 300
9 San Francisco, California 94108
10 Phone: (415) 421-7151
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/s/ Kenneth W. Brothers
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Kenneth W. Brothers
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Attorneys for Ricoh Company, Ltd.

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

RICOH COMPANY, LTD.,)
Plaintiff,) Case No. C-03-4669-MJJ (EMC)
v.)
AEROFLEX ET AL.,) CERTIFICATE OF SERVICE
Defendants.)

I am employed in Washington, District of Columbia. I am over the age of eighteen (18) years and not a party to the within action; my business address is 2101 L Street, NW, Washington, DC, 20037. On June 8, 2006, I served **RICOH'S AMENDED RESPONSES TO AEROFLEX COLORADO'S RESTATED FIRST SET OF INTERROGATORIES (1-4)** on the parties, through their attorneys of record, by sending true copies thereof to the e-mail addresses listed below:

Terry Corbin, Esq.
CorbinT@Howrey.com

Jacky Fink, Esq.
FinkJ@Howrey.com

Denise De Mory, Esq.
DeMoryD@Howrey.com

I declare that I am employed in the office of a member *pro hac vice* of the Bar of this Court at whose direction this service was made.

I declare under penalty of perjury that the foregoing is true and correct. Executed in Washington, D.C. on June 8, 2006.

W. H. Steffens

Solomon Seyoum

Exhibit 11

D I C K S T E I N S H A P I R O M O R I N & O S H I N S K Y L L P

2101 L Street NW • Washington, DC 20037-1526
Tel (202) 785-9700 • Fax (202) 887-0689

Writer's Direct Dial: (202) 429-2184
E-Mail Address: BrothersK@dsmo.com

June 8, 2006

Via PDF

Denise de Mory, Esq.
Howrey LLP
525 Market Street, Suite 3600
San Francisco, CA 94105-2708

Re: Ricoh v. Aeroflex, et al.
Synopsys v. Ricoh

Dear Denise:

We write in response to your letter of June 2, 2006 regarding Ricoh's document production. As we advised you during our meet and confers on Friday and earlier this week, we have been looking into many of the issues, some of which have been raised for the first time. It is unreasonable that you demand a comprehensive response within 72 hours, especially when the letter was provided at 3 pm on a Friday afternoon, and many of the questions required follow-up with our client in Japan.

As you are aware, many of the documents requested by the ASIC defendants or Synopsys relate to events that took place more than 15 years ago. It should be no surprise if the documents are no longer in the possession, custody or control of Ricoh. Some of your other complaints ignore Ricoh's objections to the requests. Your demands that Ricoh list all responsive Bates numbers to your requests for confirmation of the production of documents is unreasonable; where reasonably possible, we will provide examples of responsive documents, or confirm that after a reasonable search no responsive relevant non-privileged documents have been located.

Defendants and Synopsys' First set of request for production of documents:
With respect to Request No. 9, regarding the files of Kobayashi, Sugimoto, Shindo, Nakayama Or Others Who Worked on the '432 Patent: Drs. Kobayashi and Sugimoto were third party employees, not Ricoh employees, and Ricoh does not have possession, custody or control of those files. Mr. Shindo left Ricoh many years ago, and Ricoh has conducted a reasonable search for any remaining files and has produced all responsive relevant non-privileged documents have been located. Mr. Nakayama was not an inventor of the '432 patent, but was a co-inventor of the '016 patent, which is no longer part of this lawsuit, and which you have agreed is not relevant to this case. Ricoh is not aware of any other relevant non-privileged documents in its possession, custody or control that are responsive to this request.

With respect to Request 12, regarding licensing: On Monday, June 5, the parties agreed that they would mutually forego any further exchange of documents regarding

Denise De Mory, Esq.
 June 5, 2006
 Page 2

licensing, which moots most of your request. To the extent that your complaints relate to documents regarding the licensing of the '432 patent, Ricoh has produced documents responsive to this request, including, but not limited to Ricoh communications with third parties regarding licensing the '432 patent.

With respect to Requests 14-18 (documents referring to conception, reduction to practice, sales, etc.) Ricoh and third parties have produced responsive documents that the development of an embodiment of what has been called the KBSC system, some of which were marked by you during the Oka deposition.

With respect to Request 23 (documents relevant to validity, enforceability, or scope of claims): Ricoh and third parties have produced responsive documents. (See, for example, RCL 1-265).

With respect to Request 24 (searches or studies or opinions relevant to validity, enforceability, or scope of claims): Ricoh has no non-privileged, responsive documents.

With respect to Request 26 (commercial success): Documents related to damages are addressed below, otherwise Ricoh believes that Synopsys is in the best position to provide commercial success of its products that embody the claimed invention.

With respect to Request 27 (secondary considerations of obviousness): Ricoh has no non-privileged, responsive documents.

With respect to Request 29 (communications with persons recruited to offer opinions): Communications between Ricoh's counsel and any persons recruited to offer opinions is protected by privilege.

With respect to Request 31 (documents related to meeting between KBSC and Synopsys): Ricoh has no responsive documents.

With respect to Request 47-51: (documents related to Ricoh doing business in the us). This issue was addressed and resolved several years ago, and we decline to revisit it.

Synopsys' Second set of request for production of documents (Nos. 52-57): These requests mainly relate to KBSC software. The parties deferred this request as it was served in July 2004 during the discovery stay, and was never again raised by you until now. We do not understand why you have waited for so long. We will serve a formal response under separate cover. In any event, Ricoh has once again conducted a reasonable search and, aside from what has been previously produced, has been unable to locate the KBSC software. Therefore, Ricoh has no relevant responsive documents to this request.

Synopsys' third set of request for production of documents (58-60): These generally related to Ricoh's practice of the inventions, Ricoh's ASIC products, etc. As I

Denise De Mory, Esq.
 June 5, 2006
 Page 3

have previously indicated, and as the Court has ruled, Ricoh's use of its own tool is not relevant. Ricoh will not produce any responsive documents.

Defendant's third set of request for production of documents (47-79). Contrary to your suggestion, Ricoh quickly responded to your complaint. Mr. Weinstein and Mr. Smith had an initial meet and confer regarding these issues, which was to be continued to secondary date. Mr. Weinstein contacted Mr. Smith at the appointed time to continue the meet and confer, however, Mr. Smith indicated that he could not do it at that time and would reschedule. Mr. Smith has not yet rescheduled the meet and confer with Mr. Weinstein. We again confirm that Ricoh is not seeking damages recovery based on lost profits.

Defendant's fourth set of requests for production. In review of the ASIC defendant's requests, almost every request is vague in what the ASIC defendants mean by the terms of the request. As indicated in the response to request 83, the request is vague as what the ASIC defendants mean by the request. This request is asking Ricoh to search for documents from something that might have, or might not have, occurred 20 years ago, where Dr. Kobayashi, a third party's employee, and Mr. Shindo, a former Ricoh employee who left the company long ago, might have "participated". Without any further explanation, the request is vague and ambiguous. Similarly, request 84 is also inartfully drafted, as it seeks documents relating to "any ASIC or computer-aided design trade" where a 3rd party or Ricoh "presented a demonstration." Ricoh should not be held accountable for the ASICs defendants not being clear and specific in their requests.

In many instances your requests were extremely broad in terms of the temporal scope that you were seeking, and as such overbroad and unduly burdensome, as well as not likely to lead to discovery the admissible evidence. For example, in requests 80-82 you are seeking documents, regardless of time, of Suehiro, Oka, and Shindo, respectively, "to develop a computer aided design system for designing application specific integrated circuits. Leaving aside any other issues or objections, any effort of these individuals after the issuance of the patent is not relevant.

With respect to request 102, Ricoh is not indicating that the KBS is the preferred embodiment of the '432 patent nor that there is necessarily any preferred embodiment of the '432 patent. Ricoh has said it will search for and produce documents, if any, reflecting a comparison of the knowledge based silicon compiler software program created in joint development with International Chip Corporation with the performance of an ASIC engineer in designing a given application specific integrated circuit.

With respect to Request Nos. 104-113 seeking documents relating to any conversations Ricoh or any of its agents, including its attorneys, have had with various individuals relating to any knowledge-based silicon compiler, the '432 patent, or this lawsuit. Ricoh has properly excluded its attorneys from its responses. Documents exchanged between Ricoh's attorneys and testifying experts or consultants will either be provided as part of expert discovery or listed as part of privilege log in accordance with the appropriate time schedule of this case. Ricoh will not log nor produce documents

Denise De Mory, Esq.
June 5, 2006
Page 4

exchanged between Ricoh's attorneys and with non-testifying experts or consultants. You have taken the exact same position with your experts, such as Dr. Kowalski. In addition, the ASIC defendant's unlimited temporal scope is unduly broad and burdensome.

Ricoh has produced any responsive, non privileged documents that it has been able to locate after a reasonable search of the documents responsive to Defendant's fourth set of requests for production. Ricoh will not agree to identify bates numbers unless Synopsys and the ASIC defendants also agree to line up their documents with Ricoh's requested document production. You have refused to do so.

Aeroflex Colorado's first set of production of documents: These requests are not relevant because the Court has rejected your efforts to expand your laches defense. We will not produce any such documents.

Additional document requests. These requests are not tied to any specific request. In a good faith effort, Ricoh has investigated these issues.

1. Drafts of the January 15, 1957 "Contract Agreements on Joint Research and Development Projects," with the December 15, 1986 "General Contractual Agreement of Understanding" attached as Appendix B, at RCL002667- 2RCL002693. (April 11, 2006 Fink letter to Hoffman). As Gary Hoffman previously indicated, Ricoh has searched and has no such documents.

2. "A Design Example Using KBSC-Voice Synthesis LSI" referenced in "Quick Turn Around Time ASIC Design Using KBSC" at Bates numbered pages KBSC000885 - KBSC000889. (April 12, 2006 Fink letter to Hoffman). As Gary Hoffman also previously indicated, Ricoh has searched and has no such documents.

3. The documents discussed in detail in your May 25, 2006 letter (namely, a. The allegedly privileged documents and information contained in the prosecution history file of the '432 patent; b. The Takada memo regarding the Takada/Shindo/Hoffman; meeting; and c. The Hitachi license agreement and other license agreements between Ricoh and third-parties.) The first two are privileged, and the last document does not relate to the '432 patent and thus is not relevant.

4. The documents requested in your May 2, 2006 letter concerning relevant materials that the deposition witnesses indicated were in Ricoh's possession, custody or control, but that have not yet been produced. In furtherance of my letter of May 5, 2006, Ricoh has searched for but does not have the documents you have identified.

Denise De Mory, Esq.
June 5, 2006
Page 5

We believe that this resolves virtually all of the issues in your letter, and in your June 7 motion to compel. We will advise the Court accordingly.

Sincerely,

Kenneth W. Brothers

cc: Howrey distribution list

Exhibit 12

-----Original Message-----

From: DeMory, Denise [mailto:demoryd@Howrey.com]
Sent: Wed 6/14/2006 10:24 PM
To: Brothers, Kenneth
Cc: Andelman, Ethan; Fink, Jacky; Song, Joseph
Subject:

Ken:

Further to our meet and confer today, here are a list of documents still at issue, and on which, at this time, we still intend to move forward with our motion:

1. KBSC-related documents; anything that was available to Ricoh or Ricoh's counsel from KBSC/Bershader. We have agreed that we are at an impasse as to "possession, custody or control" of these documents. These documents have potential implications for every request on which we moved to compel, including 2-8 immediately below as well as the second list o

2. KBSC software as described in Requests 52-57. You will update your responses to say that you have conducted a search at Ricoh and have no additional responsive documents. We, however, reserve our rights to move with regard to documents set forth in category 1 above.

3. Source code for the ICC software delivered to Ricoh around August 1987.
4. Communications between Ricoh and ICC re: changes made by Ricoh to the software delivered by ICC around August 1987.

5. '432 prosecution history documents.
6. Takada's Shindo memo.
7. Paradyne related documents.
8. Documents related to awareness of prior art.
9. License agreement with Hitachi and similar agreements.
10. Correspondence/drafts/info for TI license agreements.

With regard to the following documents, we request a certification from counsel that a reasonable search has been conducted and other than what has been produced the following documents/categories of documents could not be located:

1. Drafts of the January 15, 1987 "Contract Agreements on Joint Research and Development Projects;"

2. "A Design Example Using KBSC-Voice Synthesis LSI" referenced in "Quick Turn Around Time ASIC Design Using KBSC;"

3. Mr. Takada's drafts of the January 15, 1987 agreement between Ricoh and ICC (KBSC 000001-03)

4. Documents from Ricoh's accounting department regarding the approval of any payments by Ricoh to ICC.

5. Invoices from Ricoh's sales and marketing department and summary documents showing the payments made by third parties to Ricoh for licenses to Ricoh's R-CAD software.

6. Mr. Takada's 1990 compilation of information regarding licenses granted on the KBSC software.

7. Drafts of the April 1, 2001 agreement between Ricoh and KBSC (RCL8925-38), including electronic drafts on the hard drive of Mr. Takada's personal computer.

8. Papers, articles, and other publications reviewed by Mr. Oka in investigating logic synthesis and algorithms that optimize logic for Ricoh prior to the December 1986 meeting between Ricoh and ICC.

9. Reports submitted by Mr. Oka on his investigation of logic synthesis and algorithms that optimize logic for Ricoh.

10. Notes taken by Mr. Oka of the December 1986 meeting between Ricoh and ICC and summaries drafted of the meeting.

11. The documents that Ricoh relied on in its decision to sue the Customer Defendants.

Regards,

Denise

This email and any attachments contain information from the law firm of Howrey LLP, which may be confidential and/or privileged.

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Exhibit 13

1 Teresa M. Corbin (SBN 132360)
2 Denise M. De Mory (SBN 168076)
3 Jaclyn C. Fink (SBN 217913)
4 HOWREY LLP
5 525 Market Street, Suite 3600
6 San Francisco, California 94105
7 Telephone: (415) 848-4900
8 Facsimile: (415) 848-4999

5 Attorneys for Plaintiff SYNOPSYS, INC. and
6 Defendants AEROFLEX INCORPORATED,
7 AEROFLEX COLORADO SPRINGS, INC., AMI
8 SEMICONDUCTOR, INC., MATROX
ELECTRONIC SYSTEMS, LTD., MATROX
GRAPHICS, INC., MATROX INTERNATIONAL
CORP., and MATROX TECH, INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

SYNOPSYS, INC.

Case No. C03-2289 MJJ (EMC)

Plaintiff,

**SYNOPSYS, INC.'S RESPONSE TO
DEFENDANT RICOH'S SECOND SET OF
INTERROGATORIES TO PLAINTIFF
SYNOPSYS**

RICOH COMPANY, LTD.,

Trial Date: November 27, 2006

Defendant.

RICOH COMPANY, LTD

Case No. C03-4669 MJJ (EMC)

Plaintiff.

VS.

AEROFLEX INCORPORATED, AEROFLEX
COLORADO SPRINGS, INC., AMI
SEMICONDUCTOR, INC., MATROX
ELECTRONIC SYSTEMS, LTD., MATROX
GRAPHICS, INC., MATROX
INTERNATIONAL CORP., and MATROX
TECH, INC..

Defendants.

1 PROPOUNDING PARTY: Ricoh Company, Ltd.

2 RESPONDING PARTY: Synopsys, Inc.

3 SET NUMBER: Two (2)

4 Pursuant to Rule 33 of the Federal Rules of Civil Procedure, Synopsys, Inc. ("Plaintiff") hereby
 5 provides its responses to Ricoh Company, Ltd.'s ("Ricoh") Second Set of Interrogatories. These
 6 responses are based on information reasonably available to Plaintiff at the present time. Plaintiff
 7 reserves the right to supplement these responses when, and if, additional information becomes
 8 available.

9 In responding to these Requests, Plaintiff will make the reasonable, diligent, and good faith
 10 search to respond as required under the Federal Rules and Local Rules. However, Plaintiff and its
 11 attorneys have not yet completed preparation for trial or concluded their analyses of the information
 12 gathered to date by the parties. These responses, therefore, are based on information presently
 13 available to and reviewed by Plaintiff and its attorneys.

14 These responses are made without waiving, in any way: (1) the right to object on any basis
 15 permitted by law to the use of any such information, for any purpose, in whole or in part, in any
 16 subsequent proceeding in this action or any other action; and (2) the right to object on any basis
 17 permitted by law to any other discovery request or proceeding involving or relating to the subject
 18 matter of these responses.

GENERAL OBJECTIONS

20 The following general objections should be interpreted to apply to each individual Interrogatory
 21 as if set forth in full in response to each individual Request:

22 1. Plaintiff objects to Ricoh's Second Set of Interrogatories as well as to the definitions
 23 and instructions to the extent that they seek information protected by the attorney-client privilege, the
 24 attorney work product immunity or any other privilege or protection afforded by state or federal law.

25 2. Plaintiff objects to Ricoh's Second Set of Interrogatories as well as to the definitions
 26 and instructions to the extent that they seek information that is subject to any protective order, privacy
 27 interest, contractual obligation, non-disclosure agreement, confidentiality agreement or other such

1 confidentiality obligation owed to any third party. Without third party permission, Plaintiff will not
 2 provide such information unless required by the Court.

3 3. Plaintiff objects to Ricoh's Second Set of Interrogatories as well as to the definitions
 4 and instructions to the extent that they seek information that is not relevant to a claim or defense of any
 5 party or to the subject matter of this litigation and not reasonably calculated to lead to the discovery of
 6 admissible evidence.

7 4. Plaintiff objects to Ricoh's Second Set of Interrogatories as overly broad and unduly
 8 burdensome to the extent that they seek information beyond what is available from a reasonable search
 9 of Plaintiff's files likely to contain relevant or responsive documents and a reasonable inquiry of
 10 Plaintiff's employees.

11 5. Plaintiff objects to Ricoh's Second Set of Interrogatories to the extent that they seek
 12 information or the identification of documents that are not within the possession, custody, or control of
 13 Plaintiff, or refers to persons, entities, or events not known to Plaintiff, subjecting them to
 14 unreasonable and undue annoyance, oppression, burden, and expense, and would impose upon them an
 15 obligation to discover information or materials from third parties or services who are equally
 16 accessible to Ricoh.

17 6. Plaintiff objects generally to Ricoh's Second Set of Interrogatories as well as to the
 18 definitions and instructions to the extent that they seek information concerning products or processes
 19 that are not made, used, sold, offered for sale or imported into the United States.

20 7. Plaintiff objects to Ricoh's Second Set of Interrogatories as well as to the definitions
 21 and instructions to the extent that they seek a legal conclusion.

22 8. Plaintiff objects to Ricoh's Second Set of Interrogatories, including its Definitions and
 23 Instructions, to the extent that they seek to modify or expand the requirements of the Federal Rules of
 24 Civil Procedure and the Local Rules of the Northern District of California and/or other applicable law.
 25 Plaintiff will respond to Ricoh's Second Set of Interrogatories as well as to the definitions and
 26 instructions in accordance with the Federal Rules of Civil Procedure, the Local Rules of the Northern
 27 District of California and/or other applicable law.

28

HOWREY LLP

PLAINTIFF SYNOPSIS' RESPONSE TO DEFENDANT
 RICOH'S SECOND SET OF INTERROGATORIES

1 9. Plaintiff objects to Ricoh's Second Set of Interrogatories as well as to the definitions
 2 and instructions to the extent that they are unreasonably cumulative, redundant, or duplicative of other
 3 Interrogatories, or seek information that is obtainable from some other source that is more convenient,
 4 less burdensome, or less expensive.

5 10. Plaintiff objects to Ricoh's Second Set of Interrogatories as well as to the definitions
 6 and instructions to the extent that they seek information for time periods beyond those relevant to the
 7 claims and defenses in the instant action on the grounds that such requests are vague, ambiguous,
 8 overly broad, unduly burdensome, and seek information that is neither relevant nor reasonably
 9 calculated to lead to the discovery of admissible evidence in the present action.

10 11. Plaintiff objects to the definition of "Synopsys" to the extent that it seeks information
 11 from individuals or entities over which Synopsys has no control or from unauthorized persons
 12 purporting to act on Plaintiff's behalf. Plaintiff further objects to the definition of "Synopsys" to the
 13 extent that it purports to include consulting experts who will not be called to testify at trial or to the
 14 extent that it purports to include attorneys and therefore, objects to any requests using such definition
 15 as seeking information protected by the attorney-client privilege and/or the attorney work product
 16 immunity.

17 **SPECIFIC OBJECTIONS TO DEFINITIONS AND INSTRUCTIONS**

18 1. Plaintiff objects to Ricoh's incorporated Definition/Instruction "t" from its November
 19 30, 2003 First Set of Interrogatories to the extent that the definition of "ASIC" is vague, overly broad,
 20 unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence.
 21 Plaintiff objects to any definition of "ASIC" to the extent that the definition extends beyond the
 22 definition of "Commercial ASICs" as defined by the parties' stipulation re supplemental production
 23 and Judge Chen's May 1, 2006 order thereon as modified by Judge Chen's May 8, 2006 Order.

24 2. Plaintiff objects to Ricoh's incorporated Definition/Instruction "u" from its November
 25 30, 2003 First Set of Interrogatories on the grounds that the definition of "ASIC Product" is vague,
 26 ambiguous, unintelligible, overly broad, unduly burdensome, and not reasonably calculated to lead to
 27 the discovery of admissible evidence. Plaintiff also objects to Definition "u" to the extent that it
 28 characterizes design as part of the manufacturing process. Plaintiff objects to any definition of "ASIC"

1 Product" to the extent that the definition extends beyond the definition of "Commercial ASICs" as
 2 defined by the parties' stipulation re supplemental production and Judge Chen's May 1, 2006 order
 3 thereon as modified by Judge Chen's May 8, 2006 Order.

4 3. Plaintiff objects to Ricoh's incorporated Definition/Instruction "w" from its November
 5 30, 2003 First Set of Interrogatories to the extent that the definition of "ASIC Method" is vague, overly
 6 broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible
 7 evidence. Plaintiff objects to any definition of "ASIC Method" to the extent that the definition extends
 8 beyond the definition of "Commercial ASICs" as defined by the parties' stipulation re supplemental
 9 production and Judge Chen's May 1, 2006 order thereon as modified by Judge Chen's May 8, 2006
 10 Order.

11 4. Plaintiff objects to Ricoh's incorporated Definition/Instruction "y" from its November
 12 30, 2003 First Set of Interrogatories to the extent that the definition of "design" is vague, overly broad,
 13 unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence.

14 5. Plaintiff incorporates the objections to Ricoh's Definitions/Instructions from Ricoh's
 15 November 30, 2003 First Set of Interrogatories as stated in Plaintiff's responses thereto.

RESPONSES AND OBJECTIONS TO SPECIFIC INTERROGATORIES

INTERROGATORY NO. 6:

18 Set forth all facts relating to Synopsys' allegations in paragraph 27 (laches defense) of the
 19 Complaint, including the identification of each individual having relevant information thereof.

RESPONSE TO INTERROGATORY NO. 6:

21 Plaintiff incorporates by reference its objections above. Plaintiff further objects to this
 22 interrogatory as unduly burdensome and overly broad, especially with respect to "all," "each," and
 23 "relevant information thereof". Plaintiff further objects to this interrogatory on the basis that it seeks
 24 the disclosure of information or the identification of documents that are protected from discovery by
 25 the attorney-client privilege and/or the attorney work product doctrine. Plaintiff further objects to this
 26 request because the information requested is equally or more available to Ricoh. Subject to and
 27 without waiving the foregoing general and specific objections, Plaintiff responds as follows:
 28

1 Ricoh's claims are barred by laches. By virtue of its licensing and use of Design Compiler
 2 dating back to the early 1990's as well as its access to Synopsys documentation, Ricoh knew or should
 3 have known that the use of Synopsys' Design Compiler would give rise to its claims of alleged
 4 infringement of the patent-in-suit. Synopsys has been openly licensing its products to ASIC
 5 manufacturers, including Ricoh, and has long made public, in SEC filings and otherwise, that it is the
 6 in business of licensing EDA software, including the accused Synopsys products. In addition, it has
 7 long been made public that the Customer Defendants were users of Synopsys' tools. Because Ricoh
 8 has long known or should have known of the Customer Defendants' use of the Synopsys products at
 9 issue and/or has long known or should have known that the Synopsys products at issue could be used
 10 in an allegedly infringing manner, Ricoh's claims are barred by laches.

11 With regard to prejudice, Ricoh sat on its alleged rights while the EDA market substantially
 12 matured and Synopsys continued to invest in and develop the accused products. Individuals at Ricoh,
 13 including engineers who used Design Compiler, as well as those responsible for licensing Design
 14 Compiler, are aware of these facts.

15 Synopsys also incorporates by reference its response to Interrogatory No. 5 from Ricoh's First
 16 Set of Interrogatories to Synopsys.

17 Synopsys identifies Kevin Kranen, Bob Dahlberg, James Davis, and Jennifer Smith as having
 18 relevant information on this topic.

19 **INTERROGATORY NO. 7:**

20 Set forth all facts that support any contention by Synopsys that the SOT tricks in Synopsys'
 21 Design Compiler® software are not in the form of "a set of rules embodying the expert knowledge of
 22 highly skilled VLSI designers, each rule having an antecedent portion (e.g., IF) and a consequent
 23 portion (e.g., THEN)," as that phrase is used in the Court's Claim Construction Order at 17, including
 24 the identification of each individual having relevant information thereof.

25 **RESPONSE TO INTERROGATORY NO. 7:**

26 Plaintiff incorporates by reference its objections above. Plaintiff objects to the extent that the
 27 phrase "a set of rules embodying the expert knowledge of highly skilled VLSI designers, each rule
 28 having an antecedent portion (e.g., IF) and a consequent portion (e.g., THEN)," the Court's

1 construction of the term “cell selection rules” is taken out of context if not considered with the term
 2 “expert system knowledge base,” since the cell selection rules must be stored in such expert system
 3 knowledge base. Plaintiff further objects to this interrogatory as unduly burdensome and overly broad,
 4 especially with respect to “all,” “any,” and “each.” Plaintiff further objects to this interrogatory on the
 5 basis that it seeks the disclosure of information or the identification of documents that are protected
 6 from discovery by the attorney-client privilege and/or the attorney work product doctrine. Plaintiff
 7 further objects to this interrogatory as calling for expert opinions or testimony. Subject to and without
 8 waiving the foregoing general and specific objections, Plaintiff responds as follows:

9 SOT tricks do not embody expert knowledge of highly skilled VLSI designers, and are not cell
 10 selection rules. Plaintiff will provide additional details in its expert reports.

11 **INTERROGATORY NO. 8:**

12 Set forth all facts (including identification of) related to the “algorithms” in the following
 13 quoted passage: “Algorithms incorporating ideas from the current rulebase which are effective at
 14 reducing area.” SP 000181026-1042 at -1030.

15 **RESPONSE TO INTERROGATORY NO. 8:**

16 Plaintiff incorporates by reference its objections above. Plaintiff further objects to this
 17 interrogatory as unduly burdensome and overly broad, especially with respect to “all.” Plaintiff further
 18 objects to this interrogatory on the basis that it seeks the disclosure of information or the identification
 19 of documents that are protected from discovery by the attorney-client privilege and/or the attorney
 20 work product doctrine. Subject to and without waiving the foregoing general and specific objections,
 21 Plaintiff responds as follows:

22 No new algorithms were included in the Metro release of Design Compiler that directly
 23 incorporated ideas from the so-called “rulebase which [were] effective at reducing area.” Tricks
 24 related to phase capabilities were added, and while the so-called “rulebase” had many entries related to
 25 phase optimization, the new tricks did not directly incorporate ideas from any so-called “rulebase
 26 which [were] effective at reducing area.”

1 **INTERROGATORY NO. 9:**

2 Set forth all facts (including identification of) related to the “algorithms” in the following
 3 quoted passage: “Improve the timing optimization algorithms to include generalized forms of rulebase
 4 rules which are effective at improving delay (if there are any)” SP 000181026-1042 at -1029-1030.

5 **RESPONSE TO INTERROGATORY NO. 9:**

6 Plaintiff incorporates by reference its objections above. Plaintiff further objects to this
 7 interrogatory as unduly burdensome and overly broad, especially with respect to “all.” Plaintiff further
 8 objects to this interrogatory on the basis that it seeks the disclosure of information or the identification
 9 of documents that are protected from discovery by the attorney-client privilege and/or the attorney
 10 work product doctrine. Subject to and without waiving the foregoing general and specific objections,
 11 Plaintiff responds as follows:

12 The sdn_comp_mog trick was derived from so-called “rulebase rules which [were] effective at
 13 improving delay.” Tricks related to levelization were added, and while the so-called “rulebase” had
 14 entries related to levelization, the new tricks did not directly incorporate ideas from any such
 15 “rulebase.”

16 **INTERROGATORY NO. 10:**

17 Set forth all facts related to the following quoted passage: “Migrate rule base 1 merged into
 18 Delay and area opto” (SP 000181026-1042 at -1032), including the identification of each individual
 19 having relevant information thereof.

20 **RESPONSE TO INTERROGATORY NO. 10:**

21 Plaintiff incorporates by reference its objections above. Plaintiff further objects to this
 22 interrogatory as unduly burdensome and overly broad, especially with respect to “all,” and “each.”
 23 Plaintiff further objects to this interrogatory on the basis that it seeks the disclosure of information or
 24 the identification of documents that are protected from discovery by the attorney-client privilege
 25 and/or the attorney work product doctrine. Subject to and without waiving the foregoing general and
 26 specific objections, Plaintiff responds as follows:

27

28

1 The quoted passage was meant to indicate that the time estimate for work related to migrating
 2 the rule base was merged into the time estimates for work related to delay and to Area opto. At least
 3 Bharat Kalyanpur has relevant information.

4 **INTERROGATORY NO. 11:**

5 Identify the “decomposition tricks” referred to in the following quoted passage:
 6 “Decomposition tricks are either rule-based or based on ABO. Decomp attempts to find combinations
 7 of smaller gates that are equivalent and once again improve cost.” SP 000166329-6333 at -6330.

8 **RESPONSE TO INTERROGATORY NO. 11:**

9 Plaintiff incorporates by reference its objections above. Plaintiff further objects to this
 10 interrogatory as unduly burdensome and overly broad. Plaintiff further objects to this interrogatory on
 11 the basis that it seeks the disclosure of information or the identification of documents that are protected
 12 from discovery by the attorney-client privilege and/or the attorney work product doctrine. Subject to
 13 and without waiving the foregoing general and specific objections, Plaintiff responds as follows:

14 The term “rule-based” referred to RBO, as contrasted to ABO. The RBO-based decomposition
 15 tricks refers to function sot_sdn_rbo_decomp(), and the ABO-based decomposition tricks refers to
 16 function sot_sdn_decomp_cell().

17 Dated: May 17, 2006

HOWREY LLP

18 By: /s/ Denise M. De Mory

19 Denise M. De Mory
 20 525 Market Street, Suite 3600
 21 San Francisco, CA 94105
 22 Attorneys for Synopsys and Aeroflex
 23 Incorporated, Aeroflex Colorado Springs, AMI
 24 Semiconductor, Inc., Matrox Electronic Systems,
 25 Ltd., Matrox Graphics, Inc., Matrox International
 26 Corp., and Matrox Tech, Inc.

PROOF OF SERVICE

2 STATE OF CALIFORNIA)
3 SAN FRANCISCO) ss.:

5 I am employed in the San Francisco, State of California. I am over the age of 18 and not a party to the within action. My business address is 525 Market Street, Suite 3600, San Francisco, California 94105-2708.

On May 17, 2006 I served on the interested parties in said action the within:

**SYNOPSYS, INC.'S RESPONSE TO DEFENDANT RICOH'S SECOND SET OF
INTERROGATORIES TO PLAINTIFF SYNOPSYS**

9 by causing said document to be sent by Electronic Mail on May 17, 2006 to the email addresses
10 indicated for the parties listed below and by placing a true copy thereof in a sealed envelope(s)
addressed as stated below and causing such envelope(s) to be delivered as follows:

11 Gary M. Hoffman, Esq.
HoffmanG@dsmo.com
12 Dickstein Shapiro Morin & Oshinsky, LLP
2101 L Street, N.W.
13 Washington, DC 20037-1526
Facsimile No.: (202) 887-0689

Jeffrey Demain, Esq.
jdemain@altshulerberzon.com
Altshuler, Berzon, Nussbaum, Rubin & Demain
177 Post Street, Suite 300
San Francisco, CA 94108
Facsimile No.: (415) 362-8064

15 Edward A. Meilman, Esq.
MeilmanE@dsmo.com
16 Dickstein Shapiro Morin & Oshinsky, LLP
17 1177 Avenue of the Americas
New York, NY 10036-2714
18 Facsimile No.: (212) 896-5471

(OVERNIGHT DELIVERY) on May 18, 2006 by depositing in a box or other facility regularly maintained by Federal Express, an express service carrier, or delivering to a courier or driver authorized by said express service carrier to receive documents, a true copy of the foregoing document in sealed envelopes or packages designated by the express service carrier, addressed as stated above, with fees for overnight delivery paid or provided for and causing such envelope(s) to be delivered by said express service carrier on.

I declare under penalty of perjury that I am employed in the office of a member of the bar of
this Court at whose direction the service was made and that the foregoing is true and correct.

Executed on May 17, 2006, at San Francisco, California.

Peter L. Kasenenko
(Type or print name)

/s/Peter L. Kasenenko
(Signature)

Exhibit 14

SYNOPSYS, INC.

V

RICOH COMPANY, LTD.

[06816.0061.000000]

#	From	To	CC	Date	# of Pages	Description	Asserted Privilege
1	I. Harrasser	cyho@avanticorp; <u>joe_brannan@avanticorp.com</u> m; <u>micheal_obrien@avanticorp.com</u>		03/26/2001	1	Email from corporate counsel regarding agreement	AC
2	B. Ekroot	<u>shevick@synopsys.com</u> ; <u>rbsegal@synopsys.com</u> ; <u>jka@synopsys.com</u>	<u>twc@synopsys.com</u>	01/26/2000	2	Email from general counsel regarding legal issue	AC
3	R. Segal	J. Adams; B. Ekroot	<u>shevick@synopsys.com</u> ; <u>twc@synopsys.com</u>	01/26/2000	1	Email regarding legal issue	WP
4				02/18/1999	13	Draft of end user software license agreement	WP
5	I.	L. Insogna		03/26/2002	3	Email regarding signatures for	AC

#	From	To	CC	Date	# of Pages	Description	Asserted Privilege
	Harrasser					amendment	
6	I. Harrasser	L. Insogna		03/06/2002	2	Email regarding agreements	AC
7	R. Englert		I. Harrasser; T. Walker	10/02/2001	1	Letter regarding special license agreement	AC
8	S. Krishna moorthy	S. Meier; miyer@synopsys.com ; R. Genevieve		06/03/2002	2	Email regarding patent	AC
9	M. Iyer	S. Krishnamoorthy; S. Meier; miyer@callsynopsys.com ; R. Genevriere		06/04/2002	2	Email regarding patent re: Magma	AC
10	A. Farooqui	K. McNall	kcarrie@synopsys.com ; neel@synopsys.com	07/13/2000	2	Email regarding patent uses re: Magma	WP
11	H. Kettmann	gal@synopsys.com ; priti@synopsys.com ; nell@synopsys.com		02/12/2002	2	Email regarding new hire to resolve issue	WP
12	S. Svoboda	D. Diaz; bard@synopsys.com		10/17/2001	1	Email regarding question forwarded by Legal IP	AC

#	From	To	CC	Date	# of Pages	Description	Asserted Privilege
13	S. Knowlton	I. Sun		07/15/2002	4	Email regarding concerns about new customer agreements and approval from legal	AC
14	P. Nash	S. Knowlton; I. Sun	bard@synopsys.com	07/15/2002	4	Email regarding End User Software Agreement	AC
15	D. Diaz	V. Mast	elainec@synopsys.COM; jcwhite@synopsys.COM; bard@synopsys.COM; twc@synopsys.COM	09/05/2002	2	Email from counsel regarding documents	AC
16	Edelman CI			01/09/2003	2	Email containing competitive media tracking report	AC
17	T. Chan	pmaroc@synopsys.com; tedcs@synopsys.com; bard@synopsys.com; smihara@synopsys.com		09/26/2001	2	Email regarding draft agreement with customer	AC
18	T. Chan			09/26/2001	15	Draft of End User Software Agreement	WP
19	T. Chan	pmaroc@synopsys.com; tedcs@synopsys.com; bard@synops		09/26/2001	2	Email instructing review of draft agreement	AC

#	From	To	CC	Date	# of Pages	Description	Asserted Privilege
		ys.com; <u>smihara@synopsys.com</u>					
20	T. Chan			09/26/2001	15	Draft of End User Software Agreement	WP
21	S. Svoboda	P. Dworsky; W. Savage; R. Tomihiro	E. Bard	10/31/2001	2	Email regarding product purchase	AC
22	P. Dworsky	svoboda@synopsys.com; W. Savage; R. Tomihiro	E. Bard	10/31/2001	2	Email regarding product purchase	AC
23	T. Schroeder	T. Chan; pmaroc@synopsys.com; bard@synopsys.com; smihara@synopsys.com		09/26/2001	2	Email regarding draft end user agreement	AC
24	D. Diaz	<u>bard@synopsys.com</u> ; svoboda@synopsys.com		10/17/2001	1	Email regarding example of use of trademark	AC
25	S. Svoboda	R. Roan	M. Posner; E. Bard	02/11/2002	3	Email regarding licensing agreement	AC
26	S. Svoboda	D. Van Beek	E. Bard	02/13/2002	1	Email regarding account questions	AC
27	S. Svoboda			02/13/2002	14	Email attachment of presentation regarding business model application	WP

#	From	To	CC	Date	# of Pages	Description	Asserted Privilege
28	B. Smith	J. Homstad; H. Blomquist; D. Schroeder; B. Jensen; J. Stoner; J. Braxel	B. Smith	12/20/1998	3	Email regarding declassification issues	AC
29	H. Burnett	tclawson@amis.com	bsmith@poci.amis.com ; richman@poci.amis.com ; wadsworth@poci.amis.com	09/07/2000	1	Email regarding change in AMI's corporate status	AC
30	junghans@amis.de	H. Burnett	tclawson@amis.com ; bsmith@poci.amis.com ; richman@poci.amis.com ; wadsworth@poci.amis.com ; ghulse@poci.amis.com ; jbraxel@poci.amis.com ; junghans@amis.de	09/12/2000	2	Email regarding development/license agreement	AC
31	H. Burnett	tclawson@amis.com ; junghans@amis.de ;	ghulse@poci.amis.com ; jbraxel@poci.amis.com	09/11/2000	1	Email regarding development/license agreement	AC

#	From	To	CC	Date	# of Pages	Description	Asserted Privilege
		<u>bsmith@poci.amis.com;</u> <u>richman@poci.amis.com;</u> <u>wadsworth@poci.amis.com</u>					
32	P. Milliken	R. Biedronski, D. Book, B. Coco, G. Haynes, S. Helmreich, J. Wayne, T. Khanna, S. Meadows, S. Meyer, R. Rominger		12/05/01	1	Sr. Staff Mtg Minutes 12/03/01 w/attachment	AC
33	T. Warren	G. Gregory, R. Bruder, D. Deem, Y.R. Hladkyj, T. Jordan, B. Lee, P. Milliken, D. Prechtel, J. Reinert, J. Reinsma, L. Shumaker		12/04/01	3	Sr. Staff Mtg Minutes 12/03/01 w/attachment	AC
34	P. Milliken	R. Biedronski, D. Book, B. Coco, G.		01/16/02	1	01/14/02 Staff minutes	AC

#	From	To	CC	Date	# of Pages	Description	Asserted Privilege
		Haynes, S. Helmreich, J. Wayne, T. Khanna, S. Meadows, S. Meyer, R. Rominger					
35	P. Milliken	R. Biedronski, D. Book, B. Coco, G. Haynes, S. Helmreich, J. Wayne, T. Khanna, S. Meadows, S. Meyer, R. Rominger		09/26/02	1	Sr. Staff Mtg Minutes 09/23/02 w/attachment	AC
36	A.F. Jordan	G. Gregory, R. Bruder, Y.R. Hladkyj, T. Jordan, B. Lee, P. Milliken, D. Prechtel, J. Reinert, J. Reinsma, L. Shumaker, H. Gardner	J. Graham, J. Linley, E. Powers	09/23/02	4	Sr. Staff Mtg Minutes 09/23/02 w/attachment	AC
37		R. Biedronski,		10/14/02	1	Sr. Staff Mtg Minutes	AC

#	From	To	CC	Date	# of Pages	Description	Asserted Privilege
	P. Milliken	D. Book, B. Coco, G. Haynes, S. Helmreich, J. Wayne, T. Khanna, S. Meadows, S. Meyer, R. Rominger				10/07/02 w/attachment	
38	B. Lee	G. Gregory, R. Bruder, Y.R. Hladkyj, T. Jordan, B. Lee, P. Milliken, D. Prechtel, J. Reinert, J. Reinsma, L. Shumaker, H. Gardner	J. Graham, J. Linley, E. Powers	10/07/02	4	Sr. Staff Mtg Minutes 09/30/02 w/attachment	AC
39	P. Milliken	R. Biedronski, D. Book, B. Coco , M. Hartwell, G. Haynes, J. Waynes, T. Khanna, S. Meadows, S. Meyer, R. Rominger		11/22/02	1	Finalized mtg minutes for 11-18	AC

#	From	To	CC	Date	# of Pages	Description	Asserted Privilege
40	S. Hayden	C. Gregory, R. Bruder, D. Deem, Y.R. Hladkyj, T. Jordan, B. Lee, P. Milliken, D. Prechtel, J. Reinert, J. Reinsma, L. Shumaker, H. Gardner	J. Graham, J. Linley, E. Powers	11/22/02	4	Sr. Staff Mtg Minutes 11/18/02 w/attachment	AC

Exhibit 16

Ricoh Co. Ltd.'s Log of Privileged Documents, April 24, 2006

All Documents Listed are Withheld Pursuant to Attorney-Client Privilege and/or Work-Product Exception

Privilege Number	Date	Pages	Description	Author	Recipient	Copyee
RCLPriv-001	1/13/1988	1	Confidential notes and materials re attorney's legal services re US Patent 4,922,432.	BELL-SELTZER-PARK-&GIBSON		
RCLPriv-002	3/3/1992	1	Confidential communication requesting attorney's legal services re patent and trademark issues.	KOBAYASHI-HIDEAKI	LINKER-RAYMOND-O.-JR.	DAVIS-JAMES-P, MOORE-BRIAN
RCLPriv-003	-	1	Confidential notes and materials re attorney's legal services re US Patent 4,922,432.	BELL-SELTZER-PARK-&GIBSON		
RCLPriv-004	-	1	Confidential notes and materials re attorney's legal services re US Patent 4,922,432.	BELL-SELTZER-PARK-&GIBSON.		
RCLPriv-005	7/6/1995	1	Confidential communication of attorney's legal services re US Patent 4,922,432.	LINKER-RAYMOND-O.-JR.	KOBAYASHI-HIDEAKI	NAKAMURA-ISAO
RCLPriv-006	3/16/1995	2	Confidential communication of attorney's legal services re US Patent 4,922,432.	LINKER-RAYMOND-O.-JR.	NAKAMURA-ISAO	KOBAYASHI-HIDEAKI
RCLPriv-007	1/12/1995	2	Confidential communication requesting attorney's legal services re US Patent 4,922,432.	NAKAMURA-ISAO	LINKER-RAYMOND-O.-JR.	
RCLPriv-008	9/18/1993	1	Confidential communication requesting attorney's legal services re US Patent 4,922,432.	MATSUSHITA-A	LINKER-RAYMOND-O.-JR.	
RCLPriv-009	9/13/1993	1	Confidential communication of attorney's legal services re US Patent 4,922,432.	LINKER-RAYMOND-O.-JR.	ITOYA-MICHIYA	

Ricoh Co. Ltd.'s Log of Privileged Documents, April 24, 2006

All Documents Listed are Withheld Pursuant to Attorney-Client Privilege and/or Work-Product Exception

RCLPriv-010	9/9/1993	1	Confidential communication of attorney's legal services re US Patent 4,922,432.	LINKER-RAYMOND-O.-JR.	MATSUMURA-S.	
RCLPriv-011	1/27/1992	1	Confidential communication of attorney's legal services re US Patent 4,922,432.	LINKER-RAYMOND-O.-JR.	KOBAYASHI-HIDEAKI	MATSUMURA-S.
RCLPriv-012	1) 6/17/1991 2) 6/18/1991	3	1) Confidential communication requesting attorney's legal services re US Patent 4,922,432. 2) Confidential communication of attorney's legal services re US Patent 4,922,432.	1) BERSHADER-BRIAN 2) LINKER-RAYMOND-O.-JR.	1) LINKER-RAYMOND-O.-JR. 2) BERSHADER-BRIAN	1) KOBAYASHI-HIDEAKI
RCLPriv-013	10/12/1990	1	Confidential communication of attorney's legal services re US Patent 4,922,432.	LINKER-RAYMOND-O.-JR.	SUGIMOTO-TAI	MATSUMURA-S.
RCLPriv-014	10/12/1990	1	Confidential communication of attorney's legal services re US Patent 4,922,432.	LINKER-RAYMOND-O.-JR.	SUGIMOTO-TAI	MATSUMURA-S.
RCLPriv-015	9/17/1990	6	Confidential communication of attorney's legal services re US Patent 4,922,432, with 9/18/1990 acknowledgement of receipt by recipient.	LINKER-RAYMOND-O.-JR.	SUGIMOTO-TAI	MATSUMURA-S.
RCLPriv-016	9/17/1990	2	Confidential communication of attorney's legal services re US Patent 4,922,432.	LINKER-RAYMOND-O.-JR.	SUGIMOTO-TAI	MATSUMURA-S.
RCLPriv-017	4/19/1990	1	Confidential communication of attorney's legal services re US Patent 4,922,432.	LINKER-RAYMOND-O.-JR.	MATSUMURA-S.	
RCLPriv-018	4/19/1990	2	Confidential communication requesting attorney's legal services re US Patent 4,922,432. (2 Copies)	MATSUMURA-S.	LINKER-RAYMOND-O.-JR.	
RCLPriv-019	4/10/1990	1	Confidential communication of attorney's legal services re US Patent 4,922,432.	LINKER-RAYMOND-O.-JR.	SUGIMOTO-TAI	MATSUMURA-S.

Ricoh Co. Ltd.'s Log of Privileged Documents, April 24, 2006

All Documents Listed are Withheld Pursuant to Attorney-Client Privilege and/or Work-Product Exception

RCLPriv-020	1/2/1990	1	Confidential communication of attorney's legal services re US Patent 4,922,432.	LINKER-RAYMOND-O.-JR.	SUGIMOTO-TAI	MATSUMURA-S.
RCLPriv-021	12/15/1989	1	Confidential communication requesting attorney's legal services re US Patent 4,922,432.	SHINDO-MASAHIRO	LINKER-RAYMOND-O.-JR.	
RCLPriv-022	12/4/1989	1	Confidential communication of attorney's legal services re US Patent 4,922,432.	LINKER-RAYMOND-O.-JR.	SUGIMOTO-TAI	MATSUMURA-S.
RCLPriv-023	11/15/1989	1	Confidential communication of attorney's legal services re US Patent 4,922,432.	LINKER-RAYMOND-O.-JR.	SUGIMOTO-TAI	MATSUMURA-S.
RCLPriv-024	8/25/1989	2	Confidential communication of attorney's legal services re US Patent 4,922,432.	LINKER-RAYMOND-O.-JR.	SUGIMOTO-TAI	MATSUMURA-S.
RCLPriv-025	4/19/1989	2	Confidential communication of attorney's legal services re US Patent 4,922,432.	LINKER-RAYMOND-O.-JR.	MATSUMURA-S.	SUGIMOTO-TAI
RCLPriv-026	4/6/1989	8	Confidential notes and materials re attorney's legal services re US Patent 4,922,432.	TAULBEE-GEORGE-M	LINKER-RAYMOND-O.-JR.	
RCLPriv-027	3/30/1989	5	Confidential communication requesting attorney's legal services re US Patent 4,922,432, Confidential notes and materials re attorney's legal services re US Patent 4,922,432.	KOBAYASHI-HIDEAKI	LINKER-RAYMOND-O.-JR.	
RCLPriv-028	3/10/1989	3	Confidential communication of attorney's legal services re US Patent 4,922,432.	LINKER-RAYMOND-O.-JR.	SUGIMOTO-TAI	

Ricoh Co. Ltd.'s Log of Privileged Documents, April 24, 2006

All Documents Listed are Withheld Pursuant to Attorney-Client Privilege and/or Work-Product Exception

RCLPriv-029	3/10/1989	2	Confidential communication of attorney's legal services re US Patent 4,922,432, with 3/13/1989 acknowledgement of receipt by recipient.	LINKER-RAYMOND-O.-JR.	SUGIMOTO-TAI	
RCLPriv-030	3/10/1989	2	Confidential communication of attorney's legal services re US Patent 4,922,432.	LINKER-RAYMOND-O.-JR.	SUGIMOTO-TAI	
RCLPriv-031	3/7/1988	9	Confidential communication requesting attorney's legal services re US Patent 4,922,432, Confidential notes and materials re attorney's legal services re US Patent 4,922,432.	SUGIMOTO-TAI	LINKER-RAYMOND-O.-JR.	
RCLPriv-032	1/30/1989	2	Confidential communication of attorney's legal services re US Patent 4,922,432.	LINKER-RAYMOND-O.-JR.	MATSUMURA-S.	SUGIMOTO-TAI, TATSUMI-HISAO
RCLPriv-033	1/10/1989	1	Confidential communication requesting attorney's legal services re US Patent 4,922,432.	TATSUMI-HISAO	MCCOY-MICHAEL-D	MATSUMURA-S.
RCLPriv-034	12/28/1988	1	Confidential communication requesting attorney's legal services re US Patent 4,922,432.	MATSUMURA-S.	LINKER-RAYMOND-O.-JR.	SUGIMOTO-TAI
RCLPriv-035	12/28/1988	1	Confidential communication requesting attorney's legal services re US Patent 4,922,432.	MATSUMURA-S.	LINKER-RAYMOND-O.-JR.	SUGIMOTO-TAI
RCLPriv-036	1/27/1989	2	Confidential communication of attorney's legal services re US Patent 4,922,432.	LINKER-RAYMOND-O.-JR.	MATSUMURA-S.	SUGIMOTO-TAI, KOBAYASHI-HIDEAKI
RCLPriv-037	1/17/1989	1	Confidential attorney's legal services communication re US Patent 4,922,432 requesting agent's services.	LINKER-RAYMOND-O.-JR.	SMITH-ROBERT-L.	

Ricoh Co. Ltd.'s Log of Privileged Documents, April 24, 2006

All Documents Listed are Withheld Pursuant to Attorney-Client Privilege and/or Work-Product Exception

RCLPriv-038	12/22/1988	1	Confidential notes and materials re attorney's legal services re US Patent 4,922,432.	LINKER-RAYMOND-O.-JR.	FILE	
RCLPriv-039	12/5/1988	5	Confidential communication of attorney's legal services re US Patent 4,922,432.	LINKER-RAYMOND-O.-JR.	MATSUMURA-S.	SUGIMOTO-TAI
RCLPriv-040	12/2/1988	1	Confidential communication of attorney's legal services re US Patent 4,922,432.	LINKER-RAYMOND-O.-JR.	SUGIMOTO-TAI	
RCLPriv-041	12/2/1988	4	Confidential communication of attorney's legal services re US Patent 4,922,432.	LINKER-RAYMOND-O.-JR.	MATSUMURA-S.	SUGIMOTO-TAI
RCLPriv-042	11/29/1988	2	Confidential notes and materials re attorney's legal services re US Patent 4,922,432.	LINKER-RAYMOND-O.-JR.	FILE	
RCLPriv-043	11/29/1988	1	Confidential communication of attorney's legal services re US Patent 4,922,432.	LINKER-RAYMOND-O.-JR.	SUGIMOTO-TAI	
RCLPriv-044	11/2/1988	2	Confidential communication of attorney's legal services re US Patent 4,922,432.	MCCOY-MICHAEL-D	MATSUMURA-S.	SUGIMOTO-TAI, TATSUMI-HISAO
RCLPriv-045	11/1/1988	1	Confidential notes and materials re attorney's legal services re US Patent 4,922,432.	BELL-SELTZER-PARK-&GIBSON		
RCLPriv-046	1/11/1988	2	Confidential communication of attorney's legal services re US Patent 4,922,432.	MCCOY-MICHAEL-D	MATSUMURA-S.	SUGIMOTO-TAI, TATSUMI-HISAO
RCLPriv-047	9/23/1988	3	Confidential communication of attorney's legal services re US Patent 4,922,432.	LINKER-RAYMOND-O.-JR.	SUGIMOTO-TAI	MCCOY-MICHAEL-D
RCLPriv-048	9/12/1988	1	Confidential communication of attorney's legal services re US Patent 4,922,432.	LINKER-RAYMOND-O.-JR.	MATSUMURA-S.	SUGIMOTO-TAI, TATSUMI-HISAO

Ricoh Co. Ltd.'s Log of Privileged Documents, April 24, 2006

All Documents Listed are Withheld Pursuant to Attorney-Client Privilege and/or Work-Product Exception

RCLPriv-049	3/21/1988	6	Confidential communication of attorney's legal services re US Patent 4,922,432.	MCCOY-MICHAEL-D.	SUGIMOTO-TAI, TATSUMI-HISAO	LINKER-RAYMOND-O.-JR.
RCLPriv-050	3/15/1988	1	Confidential communication of attorney's legal services re US Patent 4,922,432.	LINKER-RAYMOND-O.-JR.	MATSUMURA-S.	SUGIMOTO-TAI, TATSUMI-HISAO, MCCOY-MICHAEL-D
RCLPriv-051	2/5/1988	5	Confidential communication of attorney's legal services re US Patent 4,922,432.	MCCOY-MICHAEL-D	TATSUMI-HISAO	SUGIMOTO-TAI, LINKER-RAYMOND-O.-JR.
RCLPriv-052	2/1/1988	1	Confidential communication requesting attorney's legal services re US Patent 4,922,432.	TATSUMI-HISAO	MCCOY-MICHAEL-D	
RCLPriv-053	1/20/1988	2	Confidential communication of attorney's legal services re US Patent 4,922,432.	MCCOY-MICHAEL-D	TATSUMI-HISAO	MATSUMURA-S., SUGIMOTO-TAI, LINKER-RAYMOND-O.-JR.
RCLPriv-054	1/14/1988	2	Confidential communication of attorney's legal services re US Patent 4,922,432.	LINKER-RAYMOND-O.-JR.	MATSUMURA-S.	SUGIMOTO-TAI, TATSUMI-HISAO, MCCOY-MICHAEL-D
RCLPriv-055	12/26/1987	1	Confidential communication requesting attorney's legal services re US Patent 4,922,432, Confidential notes and materials re attorney's legal services re US Patent 4,922,432.	INTERNATIONAL-CHIP-CORPORATION, RICOH COMPANY, LTD.	LINKER-RAYMOND-O.-JR.	
RCLPriv-056	12/23/1987	2	Confidential communication of attorney's legal services re US Patent 4,922,432.	LINKER-RAYMOND-O.-JR.	SHINDO-MASAHIRO	TATSUMI-HISAO, SUGIMOTO-TAI
RCLPriv-057	-	1	Confidential notes and materials re attorney's legal services re US Patent 4,922,432.	BELL-SELTZER-PARK-&GIBSON		
RCLPriv-058	12/22/1987	2	Confidential communication of attorney's legal services re US Patent 4,922,432.	LINKER-RAYMOND-O.-JR.	SUGIMOTO-TAI, KOBAYASHI-HIDEAKI	

Ricoh Co. Ltd.'s Log of Privileged Documents, April 24, 2006

All Documents Listed are Withheld Pursuant to Attorney-Client Privilege and/or Work-Product Exception

RCLPriv-059	-	1	Confidential notes and materials re attorney's legal services re US Patent 4,922,432.	RICOH COMPANY, LTD.		
RCLPriv-060	-	3	Confidential notes and materials re attorney's legal services re US Patent 4,922,432.	BELL-SELTZER-PARK-&GIBSON		
RCLPriv-061	12/8/1987	21	Confidential notes and materials re attorney's legal services re US Patent 4,922,432.	BELL-SELTZER-PARK-&GIBSON		
RCLPriv-062	12/8/1987	16	Confidential notes and materials re attorney's legal services re US Patent 4,922,432.	BELL-SELTZER-PARK-&GIBSON		
RCLPriv-063	12/17/1987	11	Confidential communication requesting attorney's legal services re US Patent 4,922,432, confidential notes and materials re US Patent 4,922,432 with attorney confidential annotations.	SUGIMOTO-TAI	LINKER-RAYMOND-O.-JR.	
RCLPriv-064	12/15/1987	2	Confidential communication of attorney's legal services re US Patent 4,922,432.	MCCOY-MICHAEL-D	MATSUMURA-S., SUGIMOTO-TAI	LINKER-RAYMOND-O.-JR.
RCLPriv-065	12/15/1987	3	Confidential notes and materials re attorney's legal services re US Patent 4,922,432.	MCCOY-MICHAEL-D		
RCLPriv-066	-	38	Confidential notes and materials re attorney's legal services re US Patent 4,922,432.	BELL-SELTZER-PARK-&GIBSON		

Ricoh Co. Ltd.'s Log of Privileged Documents, April 24, 2006

All Documents Listed are Withheld Pursuant to Attorney-Client Privilege and/or Work-Product Exception

RCLPriv-067	7/1/1988	1	Material re US Patent 4,922,432 with confidential attorney legal services annotations.	BELL-SELTZER-PARK-&-GIBSON		
RCLPriv-068	-	1	Confidential notes and materials re attorney's legal services re US Patent 4,922,432.	BELL-SELTZER-PARK-&-GIBSON		

Exhibit 17

D I C K S T E I N S H A P I R O M O R I N & O S H I N S K Y L L P

1177 Avenue of the Americas • New York, NY 10036-2714

Tel (212) 835-1400 • Fax (212) 997-9880

Writer's Direct Dial: (212) 896-5471

E-Mail Address: MeilmanE@dsmo.com

January 21, 2004

BY FACSIMILE AND U.S. MAIL

(650) 463-8400

Christopher L. Kelley, Esq.
Howrey Simon Arnold & White, LLP
301 Ravenswood Avenue
Menlo Park, CA 94025

Re: *Synopsys v. Ricoh*
Ricoh v. Aeroflex
Your Ref.: 06816.0060.000000
Our Ref.: R2180.0171

Dear Chris:

In response to your letter of January 9, 2004, the individual on the documents is Mr. Shindo who, as you know, has declined to voluntarily appear for a deposition.

Messrs. Nakayama and Oka are available for deposition. We are going to tell them that their depositions will not begin before May 25, 2004 and May 26, 2004, respectively, unless you advise us to the contrary this week.

Enclosed you will find our objections to the 30(b)(6) notice to Ricoh. As presently advised, the individuals who will likely testify on behalf of Ricoh are Messrs. Oka and Takada but Ricoh reserves the right to substitute witnesses as necessary to meet the obligations of Rule 30(b)(6).

You had previously asked about the availability of Mr. Tatsumi. Between the time of my response and your letter about the dates, his availability on May 28, 2004 has ended. Do you still plan to depose him? If so, on what date?

2101 L Street NW • Washington, DC 20037-1526

Tel (202) 785-9700 • Fax (202) 887-0689

www.DicksteinShapiro.com

Christopher L. Kelley, Esq.
January 21, 2004
Page 2

For the court order, please list Gary Hoffman, Kenneth Brothers, Eric Oliver, DeAnna Allen and myself, and the order should specify a stay in Japan from May 17-29, 2004. We need the signed order in hand no later than March 17, 2004.

Very truly yours,



Edward A. Meilman

EAM/hc
Enc.

cc: Gary Hoffman, Esq.
Kenneth Brothers, Esq.
Jeffrey Demain, Esq.

Exhibit 18

AUG. 2 2004 4:34PM

VOL. 1552 P. 2

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

SYNOPSYS, INC.)	
)	Civil Action No. C03-02289 MJJ (EMC)
Plaintiff,)	
)	
v.)	
)	
RICOH COMPANY, LTD.,)	
)	
Defendants.)	
)	

**NOTICE OF SUBPOENA FOR DOCUMENTS TO BRIAN BERSHADER
ON BEHALF OF KESV, INC. PURSUANT TO FED. R. CIV. P. 45**

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

YOU ARE HEREBY NOTIFIED that, pursuant to Federal Rules of Civil Procedure 45, plaintiff Synopsys, Inc. has served on Brian Bershader on behalf of KESV, Inc. the attached subpoena for production of documents.

Brian Bershader is required to produce the documents in his custody, possession, or control specified in Attachment A by 9:00 a.m. on August 10, 2004, at the offices of Howrey Simon Arnold & White, 301 Ravenswood Ave, Menlo Park CA 94025.

A true copy of the subpoena is attached hereto and incorporated herein by this reference.

Dated: August 2, 2004

Howrey Simon Arnold & White, LLP

By: _____

Matthew E. Hocker
Attorneys for Plaintiff SYNOPSYS, INC.

AUG. 2 2004 4:34PM

NO. 1552 P. 3

ATTACHMENT A**I. DEFINITIONS**

The definitions below are incorporated into each request.

A. The terms "you," and "your" mean, without limitation, **KESV, INC.**, its past and present parents, subsidiaries, affiliates, predecessors, unincorporated divisions, officers, attorneys or agents, representatives, employees, consultants and all persons acting or purporting to act on its behalf.

B. The term "Ricoh," means, without limitation, Ricoh Company, Ltd., its past and present parents, subsidiaries, affiliates, predecessors, unincorporated divisions, officers, attorneys or agents, representatives, employees, consultants and all persons acting or purporting to act on its behalf. This definition includes Ricoh's predecessors in interest in U.S. Patent No. 4,922,432, International Chip Corporation ("ICC") and Knowledge Based Silicon Corporation ("KSB").

C. As used herein, "subsidiary" means a business enterprise, the operations of which are subject to control by a corporate parent through whole or partial stock ownership.

D. As used herein, "Customer Defendants" refers to Aeroflex, Inc., AMI Semiconductor, Inc., and Matrox Electronic Systems, Ltd., Matrox Graphics, Inc., Matrox International Corp., and Matrox Tech, Inc., all subsidiaries, affiliates, predecessors, unincorporated divisions and all its officers, employees, attorneys, agents, representatives and all persons acting or purporting to act on its behalf.

E. As used herein, "affiliate" means a company effectively controlled by another but associated with that other entity by way of common control, whether direct or indirect.

F. As used herein, the word "document" means the original and each nonidentical copy of any written, printed, typed, recorded, computerized, electronic,

taped, graphic, or other matter, in whatever form, whether in final or draft, including but not limited to all materials that constitute "writings," "recordings," "photographs," "source code" or "executable code" within the broadest meaning of Rule 1001 of the Federal Rules of Evidence and all materials that constitute "documents" within the broadest meaning of Rule 34 of the Federal Rules of Civil Procedure. The word "document" includes, without limitation, printed matter, electronic mail, materials stored on computer hard drives, diskettes, tapes, any other computer media, and any other information stored magnetically, optically or in any electronic medium and/or form.

G. Documents to be identified shall include both documents in your possession, custody and control, and all other documents of which you have knowledge. If you claim that any document was, but is no longer, in your possession or subject to your control, state what disposition was made of such document and when.

H. As used herein, "person" means any individual, firm, partnership, corporation, proprietorship, association, governmental body, or any other organization or entity.

I. As used herein, "communication" includes, without limitation, communications by whatever means transmitted (i.e., whether oral, written, electronic or other methods used), as well as any note, memorandum or other record thereof.

J. The terms "regarding, referring or relating to" and "concerning" mean reflecting, concerning, containing, pertaining, referring, relating to, indicating, showing, describing, evidencing, discussing, mentioning, embodying or computing.

K. Whenever the singular is used, it shall also be taken to include the plural, and vice versa. Whenever the conjunctive is used, it shall also be taken to include the disjunctive, and vice versa.

L. The term "prior art," is used herein in the same sense as that term is used in 35 U.S.C. § 103, and includes any patent, printed publication, prior knowledge, prior

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use, prior sale or offer of sale or other act or event defined in 35 U.S.C. § 102, taken singly or in combination.

M. As used herein, the term "Kobayashi Patent" means, individually, collectively, or in any combination, any patents or patent applications originating from United States Patent Application Number 143,821, filed on January 13, 1988, or any continuation of this application or any foreign counterpart to such patents. Such patents include, but are not limited to, United States Patent Number. 4,922,432 (the "'432 patent"), entitled "Knowledge Based Method and Apparatus For Designing Integrated Circuits Using Functional Specifications."

N. As used herein, with reference to patent applications, "continuation" includes any divisional, continuation-in-part, reissue, and continued prosecution applications.

O. As used herein, "PTO" means the United States Patent & Trademark Office.

P. The term "EMBODYING PRODUCTS" means each product made, used, marketed, imported, sold and/or offered for sale by Ricoh, International Chip Corp., and/or KBS Corp., that embodies and/or in its normal use practices one or more claims of the '432 patent, including without limitation, all versions of KBSC (Knowledge-Based Silicon Compiler, see e.g. RCL002694 – RCL002928) and/or the early implementations and variations of the KBSC system (see e.g. Ricoh's disclosure regarding Patent Local Rule 3-1(f) served June 21, 2004).

Q. The term "KBSC SYSTEM SOFTWARE" means each product made, used, marketed, imported, sold and/or offered for sale by Ricoh, International Chip Corp., and/or KBS Corp., including but not limited to all versions of KBSC system (Knowledge-Based Silicon Compiler, see e.g. RCL002694 – RCL002928), including all modules (e.g. FlowED, FlowSIM, MS, NEPTUNE, NetGen Blath, ConGen, AafTran, etc. and the attendant files containing the rules, cell database, etc.) and the early

implementations and variations of the KBSC system as identified in Ricoh's disclosure regarding Patent Local Rule 3-1(f) served June 21, 2004.

II. INSTRUCTIONS

The following instructions apply to each of the requests for documents set forth herein:

1. Please produce entire documents, including, but not limited to, attachments, enclosures, cover letters, memoranda, and appendices.
2. Pursuant to Rule 26(e) of the Federal Rules of Civil Procedure, these requests for documents shall be deemed continuous up to and following the trial of this proceeding such that any documents or things requested herein which is either discovered by you or comes within your possession, custody or control subsequent to your initial responses hereto but prior to the final conclusion of this case should be produced in a supplemental response to these Document Requests immediately upon its discovery or receipt by you or your counsel.
3. If any document is withheld under a claim of privilege, in order that the Court and the parties may determine the validity of the claim of privilege, please provide a privilege log identifying each document withheld, including
 - a. The type of document;
 - b. The approximate date, and manner of recording, creating or otherwise preparing the document;
 - c. The subject matter of the document;
 - d. The name and organizational position of the person(s) who produced the document,
 - e. The name and organizational position of the person(s) who received a copy of the document, or to whom the document was disclosed; and
 - f. The claimed grounds on which the document is being withheld and facts sufficient to show the basis for each claim of privilege.

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4. If you object to any part of a request for documents and refuse to produce documents responsive to that part, state your objection and respond to the remaining portion of that request. If you object to the scope or time period of a request for documents, state your objection and respond to the request for documents for the scope or time period you believe is appropriate.

5. Please produce all documents in the order in which they are kept in the ordinary course of business, and in their original file folders, binders, covers or containers, or facsimile thereof.

6. Any document bearing any changes, including, but not limited to, markings, handwritten notation, or other differences, that are not a part of the original text, or any reproduction thereof, is to be considered a separate document for purposes of responding to the following document requests. English translations of partial translations of foreign language documents should also be considered separate documents.

7. If a requested document is in a language other than English, please produce both the original and any existing English translation thereof.

8. If any of the following requests for documents cannot be responded to in full after exercising due diligence to secure the requested documents, please so state and respond to the extent possible, specifying your inability to respond to the remainder and stating whatever information you have regarding, referring or relating to the unanswered portions. If your response is qualified in any particular manner, set forth the details of such qualification.

9. Please produce hard copies of electronic records or produce computerized information in an intelligible format with a description of the system from which it was derived sufficient to permit rendering the materials intelligible.

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10.1552 F. 8

III. REQUESTS FOR DOCUMENTS AND THINGS

REQUEST NO. 1:

A copy of the executable code for every version of the KBSC SYSYEM SOFTWARE; including all documents and things used in the installation process such as installation disks, installation manuals, installation instructions, system requirements and the like.

REQUEST NO. 2:

A copy of the source code for every version of the KBSC SYSYEM SOFTWARE.

REQUEST NO. 3:

A copy of all files used by the KBSC SYSYEM SOFTWARE during execution, including but not limited to, the database files, hardware cell description files, the rule base, files containing any part of the knowledge base, etc.

REQUEST NO. 4:

All documents and things pertaining to design, manufacture, operation, capabilities, and/or function of the EMBODYING PRODUCTS, past or present, including manuals, installation instructions and an installation copy and/or machine-readable copy of every version, of the EMBODYING PRODUCTS.

REQUEST NO. 5:

All documents and things pertaining to design, manufacture, operation, capabilities, and/or function of FlowHDL, past or present, including manuals, installation instructions and an installation copy and/or machine-readable copy of every version of FlowHDL.

REQUEST NO. 6:

All documents and things pertaining to design, manufacture, operation, capabilities, and/or function of BlockHDL, past or present, including manuals, installation instructions and an installation copy and/or machine-readable copy of every version of the BlockHDL.

AUG. 2. 2004 4:06PM

NO. 1552 P. 9

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

SYNOPSYS, INC.

SUBPOENA IN A CIVIL CASE

v.

RICOH COMPANY, LTD.

CASE NUMBER: C03-02289 MJJ (EMC)

TO: BRIAN BERSHADER, INDIVIDUALLY AND
 ON BEHALF OF KESV, INC.
 800 W. El Camino Real, Suite 180
 Mountain View, CA 94040

YOU ARE COMMANDED to appear in the United States District Court at the place, date, and time specified below to testify in the above case.

PLACE OF TESTIMONY	COURTROOM
	DATE AND TIME

YOU ARE COMMANDED to appear at the place, date, and time specified below to testify at the taking of a deposition in the above case.

PLACE OF DEPOSITION	DATE AND TIME

YOU ARE COMMANDED to produce and permit inspection and copying of the following documents or objects at the place, date, and time specified below (list documents or objects): **SEE ATTACHMENT A**

PLACE	DATE AND TIME
Howrey Simon Arnold & White, LLP 301 Ravenswood Avenue, Menlo Park, CA 94025	August 10, 2004, 9:00 a.m.

YOU ARE COMMANDED to permit inspection of the following premises at the date and time specified below.

PREMISES	DATE AND TIME

Any organization not a party to this suit is subpoenaed for taking of a deposition shall designate one or more officers, directors, or managing agents, or other persons who consent to testify on its behalf, and may set forth, for each person designated, the matters on which the person will testify. Federal Rules of Civil Procedure 30(b)(6).

ISSUING OFFICER SIGNATURE AND TITLE (INDICATE IF ATTORNEY FOR PLAINTIFF OR DEFENDANT)	DATE
Attorney for Plaintiff	August 2, 2004
ISSUING OFFICER'S NAME, ADDRESS AND PHONE NUMBER	
Matthew E. Hocker, Howrey Simon Arnold & White, LLP, 301 Ravenswood Avenue, Menlo Park, CA 94025	
Telephone: (650) 463-8100	

AUG. 2 2004 4:07PM

NO. 1552 P. 10

(See Rule 45, Federal Rules of Civil Procedure, Parts C & D on Reverse)

PROOF OF SERVICE

SERVED	DATE	PLACE
SERVED ON (PRINT NAME)	MANNER OF SERVICE	
SERVED BY (PRINT NAME)	TITLE	

DECLARATION OF SERVER

I declare under penalty of perjury under the laws of the United States of America that the forgoing information contained in the Proof of Service is true and correct.

Executed on _____

Date _____

Signature of Server _____

Address of Server _____

Rule 45, Federal Rules of Civil Procedure, Parts C & D:

(c) PROTECTION OF PERSONS SUBJECT TO SUBPOENAS.

(1) A party or an attorney responsible for the issuance and service of a subpoena shall take reasonable steps to avoid imposing undue burden or expense on a person subject to that subpoena. The court on behalf of which the subpoena was issued shall enforce this duty and impose upon the party or attorney in breach of this duty impose upon the party or attorney in breach of this duty an appropriate sanction, which may include, but is not limited to, lost earnings and a reasonable attorney's fee.

(2)(A) A person commanded to produce and permit inspection and copying of designated books, papers, documents, or tangible things, or inspection of premises need not appear in person at the place of production or inspection unless commanded to appear for deposition, hearing or trial.

(B) Subject to paragraph (d)(2) of this rule, a person commanded to produce and permit inspection and copying may, within 14 days after service of subpoena or before the time specified for compliance if such time is less than 14 days after service, serve upon the party or attorney designated in the subpoena written objection to inspection or copying of any or all of the designated materials or of the premises. If objection is made, the party serving the subpoena shall not be entitled to inspect and copy the materials or inspect the premises except pursuant to an order of the court by which the subpoena was issued. If objection has been made, the party serving the subpoena may, upon notice to the person commanded to produce, move at any time for an order to compel the production. Such an order to compel production shall protect any person who is not a party or an officer of a party from significant expenses resulting from the inspection and copying commanded.

(3)(A) On timely motion, the court by which a subpoena was issued shall quash or modify the subpoena if it

- (i) fails to allow reasonable time for compliance;
- (ii) requires a person who is not a party or an officer of a party to travel to a place more than 100 miles from the place where that person resides, is employed or regularly transacts business in person except that, subject to the provisions of clause (c)(3)(B)(iii) of this rule, such a person may in order to attend trial be commanded to travel from any such place within the state in which the trial is held, or
- (iii) requires disclosure of privileged or other protected material and no exception or waiver applies; or
- (iv) subjects a person to undue burden.

(B) If a Subpoena

- (i) requires disclosure of a trade secret or other confidential research, development, or commercial information, or
- (ii) requires disclosure of an unrelated expert's opinion or information not describing specific events or occurrence in dispute and resulting from the expert's study made not at the request of any party, or
- (iii) requires a person who is not a party or an officer of a party to incur substantial expense to travel more than 100 miles to attend trial, the court may, to protect a person subject to or affected by the subpoena, quash or modify the subpoena, or if the party in whose behalf the subpoena is issued shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship and assures that the person to whom the subpoena is addressed will be reasonably compensated, the court may order appearance or production only upon specified conditions.

(d) DUTIES IN RESPONDING TO SUBPOENA.

- (1) A person responding to a subpoena to produce documents shall produce them as they are kept in the usual course of business or shall organize and label them to correspond with the categories in the demand.
- (2) When information subject to a subpoena is withheld on a claim that is privileged or subject to protection as trial preparation materials, the claim shall be made expressly and shall be supported by a description of the nature of the documents, communications, or things not produced that is sufficient to enable the demanding party to contest the claim.

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NO. 1552 2. 11

ATTACHMENT A**I. DEFINITIONS**

The definitions below are incorporated into each request.

A. The terms "you," and "your" mean, without limitation, **KESV, INC.**, its past and present parents, subsidiaries, affiliates, predecessors, unincorporated divisions, officers, attorneys or agents, representatives, employees, consultants and all persons acting or purporting to act on its behalf.

B. The term "Ricoh," means, without limitation, Ricoh Company, Ltd., its past and present parents, subsidiaries, affiliates, predecessors, unincorporated divisions, officers, attorneys or agents, representatives, employees, consultants and all persons acting or purporting to act on its behalf. This definition includes Ricoh's predecessors in interest in U.S. Patent No. 4,922,432, International Chip Corporation ("ICC") and Knowledge Based Silicon Corporation ("KSB").

C. As used herein, "subsidiary" means a business enterprise, the operations of which are subject to control by a corporate parent through whole or partial stock ownership.

D. As used herein, "Customer Defendants" refers to Aeroflex, Inc., AMI Semiconductor, Inc., and Matrox Electronic Systems, Ltd., Matrox Graphics, Inc., Matrox International Corp., and Matrox Tech, Inc., all subsidiaries, affiliates, predecessors, unincorporated divisions and all its officers, employees, attorneys, agents, representatives and all persons acting or purporting to act on its behalf.

E. As used herein, "affiliate" means a company effectively controlled by another but associated with that other entity by way of common control, whether direct or indirect.

F. As used herein, the word "document" means the original and each nonidentical copy of any written, printed, typed, recorded, computerized, electronic,

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taped, graphic, or other matter, in whatever form, whether in final or draft, including but not limited to all materials that constitute "writings," "recordings," "photographs," "source code" or "executable code" within the broadest meaning of Rule 1001 of the Federal Rules of Evidence and all materials that constitute "documents" within the broadest meaning of Rule 34 of the Federal Rules of Civil Procedure. The word "document" includes, without limitation, printed matter, electronic mail, materials stored on computer hard drives, diskettes, tapes, any other computer media, and any other information stored magnetically, optically or in any electronic medium and/or form.

G. Documents to be identified shall include both documents in your possession, custody and control, and all other documents of which you have knowledge. If you claim that any document was, but is no longer, in your possession or subject to your control, state what disposition was made of such document and when.

H. As used herein, "person" means any individual, firm, partnership, corporation, proprietorship, association, governmental body, or any other organization or entity.

I. As used herein, "communication" includes, without limitation, communications by whatever means transmitted (i.e., whether oral, written, electronic or other methods used), as well as any note, memorandum or other record thereof.

J. The terms "regarding, referring or relating to" and "concerning" mean reflecting, concerning, containing, pertaining, referring, relating to, indicating, showing, describing, evidencing, discussing, mentioning, embodying or computing.

K. Whenever the singular is used, it shall also be taken to include the plural, and vice versa. Whenever the conjunctive is used, it shall also be taken to include the disjunctive, and vice versa.

L. The term "prior art," is used herein in the same sense as that term is used in 35 U.S.C. § 103, and includes any patent, printed publication, prior knowledge, prior

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use, prior sale or offer of sale or other act or event defined in 35 U.S.C. § 102, taken singly or in combination.

M. As used herein, the term "Kobayashi Patent" means, individually, collectively, or in any combination, any patents or patent applications originating from United States Patent Application Number 143,821, filed on January 13, 1988, or any continuation of this application or any foreign counterpart to such patents. Such patents include, but are not limited to, United States Patent Number. 4,922,432 (the "'432 patent"), entitled "Knowledge Based Method and Apparatus For Designing Integrated Circuits Using Functional Specifications."

N. As used herein, with reference to patent applications, "continuation" includes any divisional, continuation-in-part, reissue, and continued prosecution applications.

O. As used herein, "PTO" means the United States Patent & Trademark Office.

P. The term "EMBODYING PRODUCTS" means each product made, used, marketed, imported, sold and/or offered for sale by Ricoh, International Chip Corp., and/or KBS Corp., that embodies and/or in its normal use practices one or more claims of the '432 patent, including without limitation, all versions of KBSC (Knowledge-Based Silicon Compiler, see e.g. RCL002694 – RCL002928) and/or the early implementations and variations of the KBSC system (see e.g. Ricoh's disclosure regarding Patent Local Rule 3-1(f) served June 21, 2004).

Q. The term "KBSC SYSTEM SOFTWARE" means each product made, used, marketed, imported, sold and/or offered for sale by Ricoh, International Chip Corp., and/or KBS Corp., including but not limited to all versions of KBSC system (Knowledge-Based Silicon Compiler, see e.g. RCL002694 – RCL002928), including all modules (e.g. FlowED, FlowSIM, MS, NEPTUNE, NetGen Blath, ConGen, AafTran, etc. and the attendant files containing the rules, cell database, etc.) and the early

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implementations and variations of the KBSC system as identified in Ricoh's disclosure regarding Patent Local Rule 3-1(f) served June 21, 2004.

II. INSTRUCTIONS

The following instructions apply to each of the requests for documents set forth herein:

1. Please produce entire documents, including, but not limited to, attachments, enclosures, cover letters, memoranda, and appendices.
2. Pursuant to Rule 26(e) of the Federal Rules of Civil Procedure, these requests for documents shall be deemed continuous up to and following the trial of this proceeding such that any documents or things requested herein which is either discovered by you or comes within your possession, custody or control subsequent to your initial responses hereto but prior to the final conclusion of this case should be produced in a supplemental response to these Document Requests immediately upon its discovery or receipt by you or your counsel.
3. If any document is withheld under a claim of privilege, in order that the Court and the parties may determine the validity of the claim of privilege, please provide a privilege log identifying each document withheld, including
 - a. The type of document;
 - b. The approximate date, and manner of recording, creating or otherwise preparing the document;
 - c. The subject matter of the document;
 - d. The name and organizational position of the person(s) who produced the document,
 - e. The name and organizational position of the person(s) who received a copy of the document, or to whom the document was disclosed; and
 - f. The claimed grounds on which the document is being withheld and facts sufficient to show the basis for each claim of privilege.

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4. If you object to any part of a request for documents and refuse to produce documents responsive to that part, state your objection and respond to the remaining portion of that request. If you object to the scope or time period of a request for documents, state your objection and respond to the request for documents for the scope or time period you believe is appropriate.
5. Please produce all documents in the order in which they are kept in the ordinary course of business, and in their original file folders, binders, covers or containers, or facsimile thereof.
6. Any document bearing any changes, including, but not limited to, markings, handwritten notation, or other differences, that are not a part of the original text, or any reproduction thereof, is to be considered a separate document for purposes of responding to the following document requests. English translations of partial translations of foreign language documents should also be considered separate documents.
7. If a requested document is in a language other than English, please produce both the original and any existing English translation thereof.
8. If any of the following requests for documents cannot be responded to in full after exercising due diligence to secure the requested documents, please so state and respond to the extent possible, specifying your inability to respond to the remainder and stating whatever information you have regarding, referring or relating to the unanswered portions. If your response is qualified in any particular manner, set forth the details of such qualification.
9. Please produce hard copies of electronic records or produce computerized information in an intelligible format with a description of the system from which it was derived sufficient to permit rendering the materials intelligible.

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III. REQUESTS FOR DOCUMENTS AND THINGS

REQUEST NO. 1:

A copy of the executable code for every version of the KBSC SYSYEM SOFTWARE; including all documents and things used in the installation process such as installation disks, installation manuals, installation instructions, system requirements and the like.

REQUEST NO. 2:

A copy of the source code for every version of the KBSC SYSYEM SOFTWARE.

REQUEST NO. 3:

A copy of all files used by the KBSC SYSYEM SOFTWARE during execution, including but not limited to, the database files, hardware cell description files, the rule base, files containing any part of the knowledge base, etc.

REQUEST NO. 4:

All documents and things pertaining to design, manufacture, operation, capabilities, and/or function of the EMBODYING PRODUCTS, past or present, including manuals, installation instructions and an installation copy and/or machine-readable copy of every version, of the EMBODYING PRODUCTS.

REQUEST NO. 5:

All documents and things pertaining to design, manufacture, operation, capabilities, and/or function of FlowHDL, past or present, including manuals, installation instructions and an installation copy and/or machine-readable copy of every version of FlowHDL.

REQUEST NO. 6:

All documents and things pertaining to design, manufacture, operation, capabilities, and/or function of BlockHDL, past or present, including manuals, installation instructions and an installation copy and/or machine-readable copy of every version of the BlockHDL.

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CERTIFICATE OF SERVICE

I am employed in the City and County of San Mateo, State of California in the office of a member of the bar of this court at whose direction the following service was made. I am over 18 years of age and am not a party to this action. My business address is 301 Ravenswood Avenue, Menlo Park, CA 94025.

On August 2, 2004, a true copy of **PLAINTIFF SYNOPSYS, INC.'S NOTICE OF SUBPOENA FOR DOCUMENTS TO BRIAN BERSHADER ON BEHALF OF KESV, INC.** PURSUANT TO FED. R. CIV. P. 45 was served on the following:

PURSUANT TO FED. R. CIV. P. 45 was served on the following:

Edward A. Meilman
Dickstein Shapiro Morin & Oshinsky, LLP
1177 Avenue of the Americas
New York, NY 10036-2714 Facsimile (212) 896-5471

Jeffrey Demain, Esq.
Altshuler, Berzon, Nussbaum, Rubin & Demain
177 Post Street, Suite 300
San Francisco, CA 94108 Facsimile (415) 362-8064

Gary M. Hoffman
Dickstein Shapiro Morin & Oshinsky, LLP
2101 L Street N.W.
Washington, DC 20037-1526 Facsimile (202) 887-0689

(BY U.S. MAIL – CCP § 1013a(1)) I am personally and readily familiar with the business practice of Howrey Simon Arnold & White, LLP for collection and processing of correspondence for mailing with the United States Postal Service, and I caused such envelope(s) with postage thereon fully prepaid to be placed in the United States Postal Service at Menlo Park, California.

(BY FACSIMILE – CCP § 1013(e)) I am personally and readily familiar with the business practice of Howrey Simon Arnold & White, LLP for collection and processing of document(s) to be transmitted by facsimile and I caused such document(s) on this date to be transmitted by facsimile to the offices of addressee(s) at the numbers listed below.

(PERSONAL SERVICE) I caused each such envelope to be delivered by hand to the offices of each party at the address listed above.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct. Executed on August 2, 2004, at Menlo Park, CA.

Susan J. Crane

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

RICOH COMPANY, LTD.,)	
Plaintiff,)	Civil Action No. 03-103-GMS
v.)	
AEROFLEX INCORPORATED, AMI)	
SEMICONDUCTOR, INC., MATROX)	
ELECTRONIC SYSTEMS, LTD., MATROX)	
GRAPHICS INC., MATROX)	
INTERNATIONAL CORP. and MATROX)	
TECH, INC.,)	
Defendants.)	
)	

**NOTICE OF SUBPOENA FOR DOCUMENTS AND NOTICE OF DEPOSITION
OF HIDEAKI KOBAYASHI PURSUANT TO FED. R. CIV. P. 45**

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

YOU ARE HEREBY NOTIFIED that, pursuant to Federal Rules of Civil Procedure 45, defendants AEROFLEX INCORPORATED, AMI SEMICONDUCTOR, INC., MATROX ELECTRONIC SYSTEMS, LTD., MATROX GRAPHICS INC., MATROX INTERNATIONAL CORP. and MATROX TECH, INC. ("Defendants") have caused the issuance of the attached subpoena to Hideaki Kobayashi for production of documents and deposition testimony.

The subpoena requires Hideaki Kobayashi to produce the documents in his custody, possession, or control specified in Attachment A by 5:00 p.m. on Friday June 27, 2003, at the offices of Howrey Simon Arnold & White, 301 Ravenswood Ave, Menlo Park CA 94025.

Defendants, by and through their attorneys, will take the deposition upon oral examination of Hideaki Kobayashi. The deposition will commence on Monday July 7, 2003 at 9:00 a.m. at the offices of Connolly Bove Lodge & Hutz LLP, 1220 Market Street, 10th Floor, Wilmington, DE 19899-2207 and will continue from day to day until completed.

The oral examination may be videotaped and transcribed stenographically, and will take place before an officer who is duly authorized to administer oaths. Defendants reserve the right to use the videotape testimony at trial.

CONNOLLY BOVE LODGE & HUTZ LLP

Dated: June 5, 2003



Francis DiGiovanni (#3189)
Connolly Bove Lodge & Hutz LLP
1220 Market Street
P.O. Box 2207
Wilmington, DE 19899-2207
(302) 658-9141

Attorney for Defendants

Of Counsel:

Teresa M. Corbin
Christopher L. Kelley
Erik K. Moller
Tony Kim
HOWREY SIMON ARNOLD & WHITE, LLP
301 Ravenswood Avenue
Menlo Park, CA 94025
Telephone: (650) 463-8100

Attorneys for Defendants

AO 88 (Rev. 11/94) Subpoena in a Civil Case

Issued by the
UNITED STATES DISTRICT COURT
 DISTRICT OF DELAWARE

Synopsys, Inc.

SUBPOENA IN A CIVIL CASE

v.
 Ricoh Company, Ltd., a Japanese
 corporation.

Case Number: ¹ 03-103-GMS

TO: Hideaki Kobayashi

YOU ARE COMMANDED to appear in the United States District Court at the place, date, and time specified below to testify in the above case.

PLACE OF TESTIMONY	COURTROOM
	DATE AND TIME

YOU ARE COMMANDED to appear at the place, date, and time specified below to testify at the taking of a deposition in the above case.

PLACE OF DEPOSITION	DATE AND TIME
Connolly Bove Lodge & Hutz LLP 1220 Market Street, 10th Floor, Wilmington, DE 19899	July 7, 2003 9:00 a.m.

YOU ARE COMMANDED to produce and permit inspection and copying of the following documents or objects at the place, date, and time specified below (list documents or objects):

SEE ATTACHMENT A

PLACE	DATE AND TIME
HOWREY SIMON ARNOLD & WHITE LLP 301 Ravenswood Avenue Menlo Park, CA 94025	June 27, 2003 5:00 p.m.

YOU ARE COMMANDED to permit inspection of the following premises at the date and time specified below.

PREMISES	DATE AND TIME

Any organization not a party to this suit that is subpoenaed for the taking of a deposition shall designate one or more officers, directors, or managing agents, or other persons who consent to testify on its behalf, and may set forth, for each person designated, the matters on which the person will testify. Federal Rules of Civil Procedure, 30(b)(6).

ISSUING OFFICER'S SIGNATURE AND TITLE (INDICATE IF ATTORNEY FOR PLAINTIFF OR DEFENDANT)	DATE
Christopher L. Kelley, Esq.	June 5, 2003
ISSUING OFFICER'S NAME ADDRESS AND TELEPHONE NUMBER HOWREY SIMON ARNOLD & WHITE, LLP 301 Ravenswood Avenue, Menlo Park, CA 94025	(650) 463-8100

(See Rule 45, Federal Rules of Civil Procedure, parts C & D on reverse)

¹ If action is pending in district other than district of issuance, state district under case number.

AO 88 (Rev. 11/94) Subpoena in a Civil Case**PROOF OF SERVICE**

DATE

PLACE

SERVED

SERVED ON (PRINT NAME)

MANNER OF SERVICE

SERVED BY (PRINT NAME)

TITLE

DECLARATION OF SERVER

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Proof of Service is true and correct.

Executed on _____

DATE

SIGNATURE OF SERVER

ADDRESS OF SERVER

Rule 45, Federal Rules of Civil Procedure, Parts C & D:**(c) PROTECTION OF PERSONS SUBJECT TO SUBPOENAS.**

(1) A party or an attorney responsible for the issuance and service of a subpoena shall take reasonable steps to avoid imposing undue burden or expense on a person subject to that subpoena. The court on behalf of which the subpoena was issued shall enforce this duty and impose upon the party or attorney in breach of this duty an appropriate sanction which may include, but is not limited to, lost earnings and reasonable attorney's fee.

(2) (A) A person commanded to produce and permit inspection and copying of designated books, papers, documents or tangible things, or inspection of premises need not appear in person at the place of production or inspection unless commanded to appear for deposition, hearing or trial.

(B) Subject to paragraph (d) (2) of this rule, a person commanded to produce and permit inspection and copying may, within 14 days after service of subpoena or before the time specified for compliance if such time is less than 14 days after service, serve upon the party or attorney designated in the subpoena written objection to inspection or copying of any or all of the designated materials or of the premises. If objection is made, the party serving the subpoena shall not be entitled to inspect and copy materials or inspect the premises except pursuant to an order of the court by which the subpoena was issued. If objection has been made, the party serving the subpoena may, upon notice to the person commanded to produce, move at any time for an order to compel the production. Such an order to comply production shall protect any person who is not a party or an officer of a party from significant expense resulting from the inspection and copying commanded.

(3) (A) On timely motion, the court by which a subpoena was issued shall quash or modify the subpoena if it

(i) fails to allow reasonable time for compliance,

(ii) requires a person who is not a party or an officer of a party to travel to a place more than 100 miles from the place where that person resides, is employed or regularly transacts business in person, except that, subject to

the provisions of clause (c) (3) (B) (iii) of this rule, such a person may in order to attend trial be commanded to travel from any such place within the state in which the trial is held, or the demanding party to contest the claim.

(iii) requires disclosure of privileged or other protected matter and no exception or waiver applies, or

(iv) subjects a person to undue burden.

(B) If a subpoena

(i) requires disclosure of a trade secret or other confidential research, development, or commercial information, or

(ii) requires disclosure of an unretained expert's opinion or information not describing specific events or occurrences in dispute and resulting from the expert's study made not at the request of any party, or

(iii) requires a person who is not a party or an officer of a party to incur substantial expense to travel more than 100 miles to attend trial, the court may, to protect a person subject to or affected by the subpoena, quash or modify the subpoena, or if the party in whose behalf the subpoena is issued shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship and assures that the person to whom the subpoena is addressed will be reasonably compensated, the court may order appearance or production only upon specified conditions.

(d) DUTIES IN RESPONDING TO SUBPOENA.

(1) A person responding to a subpoena to produce documents shall produce them as they are kept in the usual course of business or shall organize and label them to correspond with the categories in the demand.

(2) When information subject to a subpoena is withheld on a claim that is privileged or subject to protection as trial preparation materials, the claim shall be made expressly and shall be supported by a description of the nature of the documents, communications, or things not produced that is sufficient to enable the demanding party to contest the claim.

ATTACHMENT A

DEFINITIONS

1. The term "Ricoh" refers to Ricoh Company Ltd., its successor and predecessor business organizations and any subsidiaries of any of those business organizations.
2. The term "Aeroflex" means Aeroflex, Inc.
3. The term "AMI" means AMI Semiconductor, Inc.
4. The term "Matrox" means Matrox Electronic Systems, Ltd, Matrox Graphics, Inc, Matrox International Corp, and Matrox Tech, Inc.
5. The term "Synopsys" means Synopsys, Inc.
6. The terms "International Chip Corporation" or "ICC" refers to International Chip Corporation, its successor and predecessor organizations and any subsidiaries.
7. The terms "Knowledge Based Silicon" or "KBS" refer to Knowledge Based Silicon, Corp., its successor and predecessor organizations and any subsidiaries.
8. The term "Ricoh Litigation" means the patent case plaintiff Ricoh brought against defendants Aeroflex, AMI, and Matrox in the District of Delaware, case number 03-0103-GMS.
9. The term "432 patent" means U.S. Patent No. 4,922,432.
10. The term "016 patent" means U.S. Patent No. 5,197,016.
11. The term "document" means any writing or other tangible thing from which data or information can be obtained (translated if necessary through detection devices into reasonably usable form), and which is known to you, or in your custody, possession, or control, whether printed, recorded, reproduced by any process, or written or produced by hand, whether or not claimed to be privileged or exempt from production for any reason. Set forth below is a list of examples of writings and tangible things that are included within this definition. The list is not an exclusive definition of the writings and tangible things included within this definition, but is intended to aid you in answering the document requests that follow. Examples of writings and tangible things included within this definition of document are as follows:

Documents: letters, tape recordings, reports, agreements, communications including intercompany communications, correspondence, telegrams, memoranda, summaries, forecasts, photographs, models, statistical statements, graphs, laboratory and engineering reports and notebooks, charts, plans drawings, minutes or records of meetings including directors' meetings minutes or records of conferences, expressions or statements of policy, lists of persons attending meetings or conferences, customer lists, reports and/or summaries of interviews, reports and/or summaries of investigations, opinions or reports of consultants, appraisals, records, reports or summaries of negotiations, brochures, pamphlets, advertisements, circulars, trade letters, press releases, drafts of any documents, revisions of drafts of any documents, canceled checks, bank statements, invoices, receipts and originals of promissory notes, surveys, computer printouts, computer disks and storage.

In addition to the items on the foregoing list, any comment or notation appearing on any of the documents described above, and not a part of the original text, is considered a separate document and any draft or preliminary form of any document is also considered a separate document.

12. The term "documents relating to" means documents discussing, containing, showing, evidencing or referring to in any way, either directly or indirectly, and is meant to include among other documents, documents underlying, supporting now or previously attached or appended to, or used in the preparation of any documents called for by each request.

13. The words "communication" or "communications" are used in the broadest possible sense and mean, without limitation, any transmittal and receipt of information, whether such was by chance, prearranged, formal or informal, and specifically include conversations in person, conversations by telephone, telegrams, letters or memoranda, formal statements, press releases and newspaper articles.

14. The terms "party" or "person" shall mean any natural person, sole proprietorship, partnership, limited partnership, corporation, joint venture, trust, association, or other entity as well as all current and former officers, directors, agents, salespeople, representatives, employees, attorneys, and others acting or purporting to act on behalf of such party or person.

15. The word "identify" when used with respect to a person shall mean to state for each person: name, last known business and residence address and telephone numbers; job title(s) and dates of association with the designated company; last known employer; and, where appropriate to the extent of the interrogatory, the basis for such person's knowledge and the years for which such person is believed to have knowledge.

16. The terms "relate," "relating," or "relating to" include referring to, alluding to, or responding to, concerning, connected with, commenting on, regarding, discussing, showing, describing, reflecting, analyzing, constituting, including, mentioning, in respect of, about, or in any way logically or factually connected with the matter described in the Interrogatory.

17. The terms "and" and "or" shall be given such meaning as to bring the greatest scope to the request in question and shall not be given a meaning that would exclude information from a Interrogatory.

INSTRUCTIONS

1. Any recipient of this set of Requests who withholds any documents covered by this set of Requests by reason of a claim of privilege, or who objects to any part of any request for production, shall furnish to Synopsys a list identifying each such document for which the privilege is claimed or to which the objection relates, together with the following information:

- (a) The reason(s) for each objection or claim of privilege;
- (b) The identity of each person having knowledge of the actual basis, if any, on which the privilege or other ground for objection is based;
- (c) The exact name and title of the document;
- (d) The date of, and all serial or identification numbers appearing on the document;
- (e) The identity of each person wrote, signed, initiated, dictated, or otherwise participated in the creation of the document;
- (f) The general subject matter of the document;

- (g) The identity of each person who was an addressee of and/or who received the document or a copy thereof;
- (h) The identity of each person having custody or control of the document or a copy thereof;
- (i) The specific location of any file or files where the document, or any copy thereof, is normally or presently kept, and the identity of the custodian thereof;
- (j) The paragraph of this Request to which the document relates; and
- (k) In the case of any withheld document relates in any way to a meeting or to any other conversation, all participants in the meeting or conversation are to be identified.

2. This set of Requests is a continuing one and requires further and supplemental production by any recipient of this set of Requests as and whenever such person acquires or makes additional documents between the time of the initial production hereunder and the time of the trial of this action.

3. In the event that any document called for by this set of Requests is known to have been destroyed (either as a result of a document destruction policy or otherwise), those documents or class of documents are to be identified as follows: addressor, addressee, indicated or blind copies, date, subject matter, number of pages, attachments or appendices, all person to whom distributed, shown, or explained, date of destruction, persons authorizing destruction, and persons destroying the document.

REQUESTS FOR PRODUCTION

REQUEST FOR PRODUCTION NO. 1:

All documents related to the conception and reduction to practice of the technologies described in the '432 and '016 patents including any notebooks or other records containing the work records of Hideaki Kobayashi, Masahiro Shindo or their collaborators from 1986 to 1990.

REQUEST FOR PRODUCTION NO. 2:

All documents related to the structure or configuration of any apparatus or method for designing integrated circuits incorporating the technologies described in the '432 and '016 patents.

REQUEST FOR PRODUCTION NO. 3:

Documents describing the design and operation of any software products for integrated circuit design developed by either Ricoh, International Chip Corporation, Knowledge Based Silicon or their successors or predecessors in business. This request includes, but it not limited to, documentation for KBS's blockHDL and flowHDL products.

REQUEST FOR PRODUCTION NO. 4:

Documents establishing, relating or referring to any contractual, commercial, co-development, research or other type of relationship between any two or more of: Ricoh, International Chip Corporation, Hideaki Kobayashi, Masahiro Shindo, James Davis, Knowledge Based Silicon, Synopsys, Aeroflex, AMI, or Matrox.

REQUEST FOR PRODUCTION NO. 5:

Documents sufficient to show the dates when any products or services relating to integrated circuit design offered by Ricoh, International Chip Corporation, or Knowledge Based Silicon were first offered for sale or sold.

REQUEST FOR PRODUCTION NO. 6:

All publications, papers, patent applications, research notes or the like prepared by Hideaki Kobayashi, Masahiro Shindo, or by other persons describing work to which Kobayashi or Shindo contributed.

REQUEST FOR PRODUCTION NO. 7:

All documents related to the preparation or prosecution of U.S. or foreign patent applications filed by or on behalf of Hideaki Kobayashi.

REQUEST FOR PRODUCTION NO. 8:

All documents that refer or relate to either of the '432 or '016 patents.

REQUEST FOR PRODUCTION NO. 9:

All documents relating to any communications between any of: Ricoh, International Chip Corporation, Hideaki Kobayashi, Masahiro Shindo, James Davis, or their agents and any of: Synopsys Corporation, Cadence Design Systems, or any other business designing or selling logic synthesis software.

REQUEST FOR PRODUCTION NO. 10:

All documents relating to any communications, discussions or negotiations by any of Ricoh, International Chip Corporation, Hideaki Kobayashi, Masahiro Shindo, James Davis or their agents regarding licensing of any technology relating to logic synthesis or integrated circuit design.

CERTIFICATE OF SERVICE

I, Francis DiGiovanni, hereby certify that on this 5th day of June, 2003, a true and correct copy of the foregoing was caused to be served on the attorneys of record at the following addresses:

VIA HAND DELIVERY

Robert W. Whetzel
Richards Layton & Finger
One Rodney Square
Wilmington, DE 19899

VIA FEDERAL EXPRESS

Gary M. Hoffman
Dickstein Shapiro Morin & Oshinsky LLP
2101 L Street, N.W.
Washington, D.C. 20037-1526

VIA FEDERAL EXPRESS

Edward A. Meilman
Dickstein Shapiro Morin & Oshinsky, LLP
1177 Avenue of the Americas
New York, N.Y. 10036-2714



Francis DiGiovanni (#3189)

Exhibit 19

Teresa M. Corbin (SBN 132360)
Denise M. De Mory (SBN 168076)
Jaclyn C. Fink (SBN 217913)
HOWREY LLP
525 Market Street, Suite 3600
San Francisco, California 94105
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Attorneys for Plaintiff SYNOPSYS, INC. and Defendants AEROFLEX INCORPORATED, AEROFLEX COLORADO SPRINGS, INC., AMI SEMICONDUCTOR, INC., MATROX ELECTRONIC SYSTEMS, LTD., MATROX GRAPHICS, INC., MATROX INTERNATIONAL CORP., and MATROX TECH, INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

SYNOPSYS, INC.,

Case No. C03-2289 MJJ (EMC)

Plaintiff,

**SYNOPSYS, INC.'S RESPONSE TO
DEFENDANT RICOH'S SECOND SET OF
INTERROGATORIES TO PLAINTIFF
SYNOPSYS**

RICOH COMPANY, LTD..

Trial Date: November 27, 2006

RICOH COMPANY, LTD.

Case No. C03-4669 MJJ (EMC)

Plaintiff

VS

AEROFLEX INCORPORATED, AEROFLEX
COLORADO SPRINGS, INC., AMI
SEMICONDUCTOR, INC., MATROX
ELECTRONIC SYSTEMS, LTD., MATROX
GRAPHICS, INC., MATROX
INTERNATIONAL CORP., and MATROX
TECH INC.

Defendants.

1 PROPOUNDING PARTY: Ricoh Company, Ltd.

2 RESPONDING PARTY: Synopsys, Inc.

3 SET NUMBER: Two (2)

4 Pursuant to Rule 33 of the Federal Rules of Civil Procedure, Synopsys, Inc. ("Plaintiff") hereby
 5 provides its responses to Ricoh Company, Ltd.'s ("Ricoh") Second Set of Interrogatories. These
 6 responses are based on information reasonably available to Plaintiff at the present time. Plaintiff
 7 reserves the right to supplement these responses when, and if, additional information becomes
 8 available.

9 In responding to these Requests, Plaintiff will make the reasonable, diligent, and good faith
 10 search to respond as required under the Federal Rules and Local Rules. However, Plaintiff and its
 11 attorneys have not yet completed preparation for trial or concluded their analyses of the information
 12 gathered to date by the parties. These responses, therefore, are based on information presently
 13 available to and reviewed by Plaintiff and its attorneys.

14 These responses are made without waiving, in any way: (1) the right to object on any basis
 15 permitted by law to the use of any such information, for any purpose, in whole or in part, in any
 16 subsequent proceeding in this action or any other action; and (2) the right to object on any basis
 17 permitted by law to any other discovery request or proceeding involving or relating to the subject
 18 matter of these responses.

GENERAL OBJECTIONS

20 The following general objections should be interpreted to apply to each individual Interrogatory
 21 as if set forth in full in response to each individual Request:

22 1. Plaintiff objects to Ricoh's Second Set of Interrogatories as well as to the definitions
 23 and instructions to the extent that they seek information protected by the attorney-client privilege, the
 24 attorney work product immunity or any other privilege or protection afforded by state or federal law.

25 2. Plaintiff objects to Ricoh's Second Set of Interrogatories as well as to the definitions
 26 and instructions to the extent that they seek information that is subject to any protective order, privacy
 27 interest, contractual obligation, non-disclosure agreement, confidentiality agreement or other such

1 confidentiality obligation owed to any third party. Without third party permission, Plaintiff will not
2 provide such information unless required by the Court.

3 3. Plaintiff objects to Ricoh's Second Set of Interrogatories as well as to the definitions
4 and instructions to the extent that they seek information that is not relevant to a claim or defense of any
5 party or to the subject matter of this litigation and not reasonably calculated to lead to the discovery of
6 admissible evidence.

7 4. Plaintiff objects to Ricoh's Second Set of Interrogatories as overly broad and unduly
8 burdensome to the extent that they seek information beyond what is available from a reasonable search
9 of Plaintiff's files likely to contain relevant or responsive documents and a reasonable inquiry of
10 Plaintiff's employees.

11 5. Plaintiff objects to Ricoh's Second Set of Interrogatories to the extent that they seek
12 information or the identification of documents that are not within the possession, custody, or control of
13 Plaintiff, or refers to persons, entities, or events not known to Plaintiff, subjecting them to
14 unreasonable and undue annoyance, oppression, burden, and expense, and would impose upon them an
15 obligation to discover information or materials from third parties or services who are equally
16 accessible to Ricoh.

17 6. Plaintiff objects generally to Ricoh's Second Set of Interrogatories as well as to the
18 definitions and instructions to the extent that they seek information concerning products or processes
19 that are not made, used, sold, offered for sale or imported into the United States.

20 7. Plaintiff objects to Ricoh's Second Set of Interrogatories as well as to the definitions
21 and instructions to the extent that they seek a legal conclusion.

22 8. Plaintiff objects to Ricoh's Second Set of Interrogatories, including its Definitions and
23 Instructions, to the extent that they seek to modify or expand the requirements of the Federal Rules of
24 Civil Procedure and the Local Rules of the Northern District of California and/or other applicable law.
25 Plaintiff will respond to Ricoh's Second Set of Interrogatories as well as to the definitions and
26 instructions in accordance with the Federal Rules of Civil Procedure, the Local Rules of the Northern
27 District of California and/or other applicable law.

28

HOWREY LLP

PLAINTIFF SYNOPSIS' RESPONSE TO DEFENDANT
RICOH'S SECOND SET OF INTERROGATORIES

-3-

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1 9. Plaintiff objects to Ricoh's Second Set of Interrogatories as well as to the definitions
 2 and instructions to the extent that they are unreasonably cumulative, redundant, or duplicative of other
 3 Interrogatories, or seek information that is obtainable from some other source that is more convenient,
 4 less burdensome, or less expensive.

5 10. Plaintiff objects to Ricoh's Second Set of Interrogatories as well as to the definitions
 6 and instructions to the extent that they seek information for time periods beyond those relevant to the
 7 claims and defenses in the instant action on the grounds that such requests are vague, ambiguous,
 8 overly broad, unduly burdensome, and seek information that is neither relevant nor reasonably
 9 calculated to lead to the discovery of admissible evidence in the present action.

10 11. Plaintiff objects to the definition of "Synopsys" to the extent that it seeks information
 11 from individuals or entities over which Synopsys has no control or from unauthorized persons
 12 purporting to act on Plaintiff's behalf. Plaintiff further objects to the definition of "Synopsys" to the
 13 extent that it purports to include consulting experts who will not be called to testify at trial or to the
 14 extent that it purports to include attorneys and therefore, objects to any requests using such definition
 15 as seeking information protected by the attorney-client privilege and/or the attorney work product
 16 immunity.

17 **SPECIFIC OBJECTIONS TO DEFINITIONS AND INSTRUCTIONS**

18 1. Plaintiff objects to Ricoh's incorporated Definition/Instruction "t" from its November
 19 30, 2003 First Set of Interrogatories to the extent that the definition of "ASIC" is vague, overly broad,
 20 unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence.
 21 Plaintiff objects to any definition of "ASIC" to the extent that the definition extends beyond the
 22 definition of "Commercial ASICs" as defined by the parties' stipulation re supplemental production
 23 and Judge Chen's May 1, 2006 order thereon as modified by Judge Chen's May 8, 2006 Order.

24 2. Plaintiff objects to Ricoh's incorporated Definition/Instruction "u" from its November
 25 30, 2003 First Set of Interrogatories on the grounds that the definition of "ASIC Product" is vague,
 26 ambiguous, unintelligible, overly broad, unduly burdensome, and not reasonably calculated to lead to
 27 the discovery of admissible evidence. Plaintiff also objects to Definition "u" to the extent that it
 28 characterizes design as part of the manufacturing process. Plaintiff objects to any definition of "ASIC"

1 Product" to the extent that the definition extends beyond the definition of "Commercial ASICs" as
 2 defined by the parties' stipulation re supplemental production and Judge Chen's May 1, 2006 order
 3 thereon as modified by Judge Chen's May 8, 2006 Order.

4 3. Plaintiff objects to Ricoh's incorporated Definition/Instruction "w" from its November
 5 30, 2003 First Set of Interrogatories to the extent that the definition of "ASIC Method" is vague, overly
 6 broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible
 7 evidence. Plaintiff objects to any definition of "ASIC Method" to the extent that the definition extends
 8 beyond the definition of "Commercial ASICs" as defined by the parties' stipulation re supplemental
 9 production and Judge Chen's May 1, 2006 order thereon as modified by Judge Chen's May 8, 2006
 10 Order.

11 4. Plaintiff objects to Ricoh's incorporated Definition/Instruction "y" from its November
 12 30, 2003 First Set of Interrogatories to the extent that the definition of "design" is vague, overly broad,
 13 unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence.

14 5. Plaintiff incorporates the objections to Ricoh's Definitions/Instructions from Ricoh's
 15 November 30, 2003 First Set of Interrogatories as stated in Plaintiff's responses thereto.

RESPONSES AND OBJECTIONS TO SPECIFIC INTERROGATORIES

INTERROGATORY NO. 6:

18 Set forth all facts relating to Synopsys' allegations in paragraph 27 (laches defense) of the
 19 Complaint, including the identification of each individual having relevant information thereof.

RESPONSE TO INTERROGATORY NO. 6:

21 Plaintiff incorporates by reference its objections above. Plaintiff further objects to this
 22 interrogatory as unduly burdensome and overly broad, especially with respect to "all," "each," and
 23 "relevant information thereof". Plaintiff further objects to this interrogatory on the basis that it seeks
 24 the disclosure of information or the identification of documents that are protected from discovery by
 25 the attorney-client privilege and/or the attorney work product doctrine. Plaintiff further objects to this
 26 request because the information requested is equally or more available to Ricoh. Subject to and
 27 without waiving the foregoing general and specific objections, Plaintiff responds as follows:
 28

1 Ricoh's claims are barred by laches. By virtue of its licensing and use of Design Compiler
 2 dating back to the early 1990's as well as its access to Synopsys documentation, Ricoh knew or should
 3 have known that the use of Synopsys' Design Compiler would give rise to its claims of alleged
 4 infringement of the patent-in-suit. Synopsys has been openly licensing its products to ASIC
 5 manufacturers, including Ricoh, and has long made public, in SEC filings and otherwise, that it is the
 6 in business of licensing EDA software, including the accused Synopsys products. In addition, it has
 7 long been made public that the Customer Defendants were users of Synopsys' tools. Because Ricoh
 8 has long known or should have known of the Customer Defendants' use of the Synopsys products at
 9 issue and/or has long known or should have known that the Synopsys products at issue could be used
 10 in an allegedly infringing manner, Ricoh's claims are barred by laches.

11 With regard to prejudice, Ricoh sat on its alleged rights while the EDA market substantially
 12 matured and Synopsys continued to invest in and develop the accused products. Individuals at Ricoh,
 13 including engineers who used Design Compiler, as well as those responsible for licensing Design
 14 Compiler, are aware of these facts.

15 Synopsys also incorporates by reference its response to Interrogatory No. 5 from Ricoh's First
 16 Set of Interrogatories to Synopsys.

17 Synopsys identifies Kevin Kranen, Bob Dahlberg, James Davis, and Jennifer Smith as having
 18 relevant information on this topic.

19 **INTERROGATORY NO. 7:**

20 Set forth all facts that support any contention by Synopsys that the SOT tricks in Synopsys'
 21 Design Compiler® software are not in the form of "a set of rules embodying the expert knowledge of
 22 highly skilled VLSI designers, each rule having an antecedent portion (e.g., IF) and a consequent
 23 portion (e.g., THEN)," as that phrase is used in the Court's Claim Construction Order at 17, including
 24 the identification of each individual having relevant information thereof.

25 **RESPONSE TO INTERROGATORY NO. 7:**

26 Plaintiff incorporates by reference its objections above. Plaintiff objects to the extent that the
 27 phrase "a set of rules embodying the expert knowledge of highly skilled VLSI designers, each rule
 28 having an antecedent portion (e.g., IF) and a consequent portion (e.g., THEN)," the Court's

1 construction of the term “cell selection rules” is taken out of context if not considered with the term
 2 “expert system knowledge base,” since the cell selection rules must be stored in such expert system
 3 knowledge base. Plaintiff further objects to this interrogatory as unduly burdensome and overly broad,
 4 especially with respect to “all,” “any,” and “each.” Plaintiff further objects to this interrogatory on the
 5 basis that it seeks the disclosure of information or the identification of documents that are protected
 6 from discovery by the attorney-client privilege and/or the attorney work product doctrine. Plaintiff
 7 further objects to this interrogatory as calling for expert opinions or testimony. Subject to and without
 8 waiving the foregoing general and specific objections, Plaintiff responds as follows:

9 SOT tricks do not embody expert knowledge of highly skilled VLSI designers, and are not cell
 10 selection rules. Plaintiff will provide additional details in its expert reports.

11 **INTERROGATORY NO. 8:**

12 Set forth all facts (including identification of) related to the “algorithms” in the following
 13 quoted passage: “Algorithms incorporating ideas from the current rulebase which are effective at
 14 reducing area.” SP 000181026-1042 at -1030.

15 **RESPONSE TO INTERROGATORY NO. 8:**

16 Plaintiff incorporates by reference its objections above. Plaintiff further objects to this
 17 interrogatory as unduly burdensome and overly broad, especially with respect to “all.” Plaintiff further
 18 objects to this interrogatory on the basis that it seeks the disclosure of information or the identification
 19 of documents that are protected from discovery by the attorney-client privilege and/or the attorney
 20 work product doctrine. Subject to and without waiving the foregoing general and specific objections,
 21 Plaintiff responds as follows:

22 No new algorithms were included in the Metro release of Design Compiler that directly
 23 incorporated ideas from the so-called “rulebase which [were] effective at reducing area.” Tricks
 24 related to phase capabilities were added, and while the so-called “rulebase” had many entries related to
 25 phase optimization, the new tricks did not directly incorporate ideas from any so-called “rulebase
 26 which [were] effective at reducing area.”

1 **INTERROGATORY NO. 9:**

2 Set forth all facts (including identification of) related to the “algorithms” in the following
 3 quoted passage: “Improve the timing optimization algorithms to include generalized forms of rulebase
 4 rules which are effective at improving delay (if there are any)” SP 000181026-1042 at -1029-1030.

5 **RESPONSE TO INTERROGATORY NO. 9:**

6 Plaintiff incorporates by reference its objections above. Plaintiff further objects to this
 7 interrogatory as unduly burdensome and overly broad, especially with respect to “all.” Plaintiff further
 8 objects to this interrogatory on the basis that it seeks the disclosure of information or the identification
 9 of documents that are protected from discovery by the attorney-client privilege and/or the attorney
 10 work product doctrine. Subject to and without waiving the foregoing general and specific objections,
 11 Plaintiff responds as follows:

12 The sdn_comp_mog trick was derived from so-called “rulebase rules which [were] effective at
 13 improving delay.” Tricks related to levelization were added, and while the so-called “rulebase” had
 14 entries related to levelization, the new tricks did not directly incorporate ideas from any such
 15 “rulebase.”

16 **INTERROGATORY NO. 10:**

17 Set forth all facts related to the following quoted passage: “Migrate rule base 1 merged into
 18 Delay and area opto” (SP 000181026-1042 at -1032), including the identification of each individual
 19 having relevant information thereof.

20 **RESPONSE TO INTERROGATORY NO. 10:**

21 Plaintiff incorporates by reference its objections above. Plaintiff further objects to this
 22 interrogatory as unduly burdensome and overly broad, especially with respect to “all,” and “each.”
 23 Plaintiff further objects to this interrogatory on the basis that it seeks the disclosure of information or
 24 the identification of documents that are protected from discovery by the attorney-client privilege
 25 and/or the attorney work product doctrine. Subject to and without waiving the foregoing general and
 26 specific objections, Plaintiff responds as follows:

1 The quoted passage was meant to indicate that the time estimate for work related to migrating
 2 the rule base was merged into the time estimates for work related to delay and to Area opto. At least
 3 Bharat Kalyanpur has relevant information.

4 **INTERROGATORY NO. 11:**

5 Identify the “decomposition tricks” referred to in the following quoted passage:
 6 “Decomposition tricks are either rule-based or based on ABO. Decomp attempts to find combinations
 7 of smaller gates that are equivalent and once again improve cost.” SP 000166329-6333 at -6330.

8 **RESPONSE TO INTERROGATORY NO. 11:**

9 Plaintiff incorporates by reference its objections above. Plaintiff further objects to this
 10 interrogatory as unduly burdensome and overly broad. Plaintiff further objects to this interrogatory on
 11 the basis that it seeks the disclosure of information or the identification of documents that are protected
 12 from discovery by the attorney-client privilege and/or the attorney work product doctrine. Subject to
 13 and without waiving the foregoing general and specific objections, Plaintiff responds as follows:

14 The term “rule-based” referred to RBO, as contrasted to ABO. The RBO-based decomposition
 15 tricks refers to function sot_sdn_rbo_decomp(), and the ABO-based decomposition tricks refers to
 16 function sot_sdn_decomp_cell().

17 Dated: May 17, 2006

HOWREY LLP

18 By: /s/ Denise M. De Mory

19 Denise M. De Mory

20 525 Market Street, Suite 3600

21 San Francisco, CA 94105

22 Attorneys for Synopsys and Aeroflex

23 Incorporated, Aeroflex Colorado Springs, AMI

24 Semiconductor, Inc., Matrox Electronic Systems,

25 Ltd., Matrox Graphics, Inc., Matrox International

26 Corp., and Matrox Tech, Inc.

PROOF OF SERVICE

1 STATE OF CALIFORNIA)
 2) ss.:
 3 SAN FRANCISCO)

4 I am employed in the San Francisco, State of California. I am over the age of 18 and not a
 5 party to the within action. My business address is 525 Market Street, Suite 3600, San Francisco,
 6 California 94105-2708.

7 On May 17, 2006 I served on the interested parties in said action the within:

8 **SYNOPSYS, INC.'S RESPONSE TO DEFENDANT RICOH'S SECOND SET OF
 INTERROGATORIES TO PLAINTIFF SYNOPSYS**

9 by causing said document to be sent by Electronic Mail on May 17, 2006 to the email addresses
 10 indicated for the parties listed below and by placing a true copy thereof in a sealed envelope(s)
 addressed as stated below and causing such envelope(s) to be delivered as follows:

11 Gary M. Hoffman, Esq. HoffmanG@dsmo.com	Jeffrey Demain, Esq. jdemain@altshulerberzon.com
12 Dickstein Shapiro Morin & Oshinsky, LLP 2101 L Street, N.W. 13 Washington, DC 20037-1526 Facsimile No.: (202) 887-0689	Altshuler, Berzon, Nussbaum, Rubin & Demain 177 Post Street, Suite 300 San Francisco, CA 94108 Facsimile No.: (415) 362-8064
14 Edward A. Meilman, Esq. MeilmanE@dsmo.com	
15 Dickstein Shapiro Morin & Oshinsky, LLP 1177 Avenue of the Americas New York, NY 10036-2714 17 Facsimile No.: (212) 896-5471	

16 (OVERNIGHT DELIVERY) on May 18, 2006 by depositing in a box or other facility regularly
 17 maintained by Federal Express, an express service carrier, or delivering to a courier or driver
 18 authorized by said express service carrier to receive documents, a true copy of the foregoing
 19 document in sealed envelopes or packages designated by the express service carrier, addressed
 20 as stated above, with fees for overnight delivery paid or provided for and causing such
 21 envelope(s) to be delivered by said express service carrier on.

22 I declare under penalty of perjury that I am employed in the office of a member of the bar of
 23 this Court at whose direction the service was made and that the foregoing is true and correct.

24 Executed on May 17, 2006, at San Francisco, California.

25 Peter L. Kasenenko

(Type or print name)

/s/Peter L. Kasenenko

(Signature)

Exhibit 20

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

RICOH COMPANY, LTD.,)
Plaintiff,)
v.)
AEROFLEX INCORPORATED, AMI SEMICONDUCTOR, INC., MATROX ELECTRONIC SYSTEMS, LTD., MATROX GRAPHICS INC., MATROX INTERNATIONAL CORP. and MATROX TECH, INC.,)
Defendants.)

Civil Action No. 03-103-GMS

AEROFLEX INCORPORATED'S ~~RESTATEO~~
FIRST SET OF
INTERROGATORIES (NOS. 1
THROUGH ~~11~~)
9

**DEFENDANT AEROFLEX INCORPORATED'S
FIRST SET OF INTERROGATORIES (1 - 11)**

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, defendant Aeroflex Incorporated ("Aeroflex") hereby requests plaintiff Ricoh Company Ltd. ("Ricoh") to answer separately and truthfully in writing under oath within 30 days service hereof each of the Interrogatories set forth below, in accordance with the following Definitions and Instructions.

I. DEFINITIONS

The definitions below are incorporated into each interrogatory.

A. The terms "Ricoh," "Plaintiff," "you," and "your" mean, without limitation, Ricoh Company Ltd., its past and present parents, subsidiaries, affiliates, predecessors, unincorporated divisions, officers, attorneys or agents, representatives, employees, consultants and all persons acting or purporting to act on its behalf. This definition includes Ricoh's predecessors in interest in the '432 patent, International Chip Corporation and Knowledge Based Silicon Corporation.

B. The terms "Aeroflex" and "Defendant" refer, without limitation, to Aeroflex Incorporated, all subsidiaries, affiliates, predecessors, unincorporated divisions and all its officers, employees, attorneys, agents, representatives and all persons acting or purporting to act on its behalf.

C. As used herein, "subsidiary" means a business enterprise, the operations of which are subject to Plaintiff's or Defendant's control through whole or partial stock ownership.

D. As used herein, "affiliate" means a company effectively controlled by another but associated with Plaintiff or Defendant under common control, whether direct or indirect.

E. As used herein, the word "document" means the original and each nonidentical copy of any written, printed, typed, recorded, computerized, electronic, taped, graphic, or other matter, in whatever form, whether in final or draft, including but not limited to all materials that constitute "writings" or "recordings" or "photographs" within the broadest meaning of Rule 1001 of the Federal Rules of Evidence and all materials that constitute "documents" within the broadest meaning of Rule 34 of the Federal Rules of Civil Procedure. The word "document" includes, without limitation, printed matter, electronic mail, materials stored on computer hard drives, diskettes, tapes, any other computer media, and any other information stored magnetically or electronically.

F. As used herein, the terms "identify," "identification," or "identity," when used with respect to a document, means to provide information sufficient to locate that document, including, but not limited to:

- 1) The type of document (e.g., letter, memorandum, drawing, etc.);
- 2) The title or heading of the document;
- 3) The subject matter of the document;
- 4) The date appearing on the document, or, if no date appears thereon, the approximate date the document was prepared;
- 5) The identifying code number, file number, title, or label of the document;

- 6) The production number of the document, if Ricoh has produced the document to any Defendant;
- 7) The number of pages of which the document consists;
- 8) The identity of each person who signed or authorized the document;
- 9) The identity of each addressee;
- 10) The identity of each person having possession, custody or control of the document;
- 11) If the document existed at one time but does not presently exist, the reason(s) why the document no longer exists and the identity of the last person having custody of it; and
- 12) If the document is in a foreign language, whether an English translation of the document exists, whether partial or complete.

Under Rule 33(d) of the Federal Rules of Civil Procedure, production of the document may be responsive to some of the requested information.

G. As used herein, the terms "identify," "identification," or "identity," when used with respect to any natural person, means to provide the following information:

- 1) The person's full name;
- 2) Last known home address;
- 3) Last known business address and telephone number;
- 4) Last known title or occupation;
- 5) Last known employer; and
- 6) Any and all employment positions the person has held with Ricoh or any related company.

H. As used herein, the terms "identify," "identification," or "identity," with respect to any legal entity, such as a corporation, company, or person other than a natural person, means to provide the following information:

- 1) The entity's name;

- 2) The place of incorporation or organization;
- 3) The principal place of business; and
- 4) The nature of the business conducted by that legal entity.

I. As used herein, the terms "identify," "identification," or "identity," with respect to a communication, means to provide the following information:

- 1) The identity of the person(s) making the communication or contributing in any substantive fashion to its creation;
- 2) The identity of the recipient and of any person(s) before whom the communication was made or who witnessed it or who has knowledge of it;
- 3) The identity of all documents reflecting, referring, or relating to the communication;
- 4) The nature, substance, and contents of the communication;
- 5) The date of the communication; and
- 6) The production numbers for the document, if Ricoh has produced the document to any Defendant.

J. As used herein, the terms "identify," "identification," or "identity," with respect to a product, device, or other object of manufacture, means to provide the following information:

- 1) The model number, part number, code number, serial number, or other manufacturing identification number or name; and
- 2) The trade name of the product, including any other names associated with the product, or identification numbers associated with the product.

K. As used herein, "person" means any individual, firm, partnership, corporation, proprietorship, association, governmental body, or any other organization or entity.

L. As used herein, "communication" includes, without limitation, communications by whatever means transmitted (i.e., whether oral, written, electronic or other methods used), as well as any note, memorandum or other record thereof.

M. The terms "regarding, referring or relating to" and "concerning" mean reflecting, concerning, containing, pertaining, referring, relating to, indicating, showing, describing, evidencing, discussing, mentioning, embodying or computing.

N. Whenever the singular is used, it shall also be taken to include the plural, and vice versa. Whenever the conjunctive is used, it shall also be taken to include the disjunctive, and vice versa.

O. The term "prior art," is used herein in the same sense as that term is used in 35 U.S.C. section 103, and includes any patent, printed publication, prior knowledge, prior use, prior sale or offer of sale or other act or event defined in 35 U.S.C. section 102, taken singly or in combination.

P. As used herein, the term "'432 patent" means United States Patent Number 4,922,432, entitled "Knowledge Based Method and Apparatus For Designing Integrated Circuits Using Functional Specifications."

Q. As used herein, the term "Kobayashi Patents" means, individually, collectively, or in any combination, any patents or patent applications originating from United States Patent Application Number 143,821, filed on January 13, 1988, or any continuation of this application or any foreign counterpart to such patents. Such patents include, but are not limited to, the '432 patent.

R. As used herein, "continuation" includes any divisional, continuation-in-part, reissue, and continued prosecution applications.

II. INSTRUCTIONS

The following instructions apply to each of the Interrogatories set forth herein:

1. In answering these Interrogatories, you are required to furnish truthfully and in good faith all information that is presently available to you, regardless of whether such

information was obtained directly by you, your attorneys, their agents, employees or investigators.

2. Each Interrogatory shall be answered fully unless it is in good faith objected to, in which event the reasons for your objection shall be stated in detail. If an objection pertains to only a portion of an interrogatory or to a word, phrase, or clause contained in it, you are required to state your objection to that portion only and to respond to the remainder of the interrogatory, using your best efforts to do so. Your answers hereto are to be signed and verified by the person making them, and the objections signed by the attorney making them.

3. If you or your counsel assert that any information or response herein requested is privileged or otherwise protected from discovery, please set forth in your written response hereto with respect to each document, communication or thing for which a claim of privilege is made:

- a. The approximate date, and manner of recording, creating or otherwise preparing the document, communication or thing;
- b. The name and organizational position, if any, of each sender of the document, communication or thing;
- c. The name and organizational position, if any, of each recipient and/or custodian of the document, communication or thing;
- d. The name and organizational position, if any, of each person (other than stenographic or clerical assistants) participating in the preparation or creation of the document, communication or thing;
- e. The name and organizational position, if any, of each person to whom the contents of the document, communication or thing or any portion thereof have heretofore been communicated by copy, exhibition, reading or summarization; and

f. A statement of the basis on which privilege is claimed with respect to each document, communication or thing and whether or not its contents are limited solely to legal advice or information provided for the purpose of securing legal advice.

4. Pursuant to Federal Rule of Civil Procedure 26(e), the Interrogatories propounded herein shall be deemed continuous up to and following the trial of this proceeding such that any information requested herein which is either discovered by you or comes within your possession, custody or control subsequent to your initial response hereto but prior to the final conclusion of this case should be produced in a supplemental response to these Interrogatories immediately upon its discovery or receipt by you or your counsel.

III. INTERROGATORIES

INTERROGATORY NO. 1:

~~Identify all claims of the '432 patent or any other patents owned by Ricoh that Ricoh contends are or were infringed literally, under the doctrine of equivalents, and/or under 35 U.S.C. §271(b) and (c), by any products or processes manufactured, used, sold, or offered for sale by Aeroflex, such identification to be provided in the form of an infringement chart which, separately with respect to each claim that Ricoh contends is infringed, shall a) identify the product or process manufactured, used, sold, or offered for sale by Aeroflex that Ricoh contends infringe that claim; b) state whether Ricoh's infringement contention is based on literal infringement, the doctrine of equivalents, and/or 35 U.S.C. §271(b) and/or (c); c) describe where each element of each claim is found within the accused product or process, and a complete and concise citation and quotation to document(s), testimony, or other evidence on which Ricoh relies in support of its infringement contention(s); d) identify and produce each document or thing on which Ricoh relies in support of the foregoing contentions; and e) identify all persons having knowledge of the facts supporting the ongoing contentions. If the alleged infringement is under 35 U.S.C. §271(b) or (c), state in complete detail how the allegedly infringing product satisfies each element of the claim.~~

INTERROGATORY NO. 2:

State each fact that supports the allegation in paragraph 19 of your Complaint that "Aeroflex's infringement of the '432 patent is willful," including, but not limited to, the date on and manner in which Aeroflex was first notified or became aware of its alleged infringement of the '432 patent; the allegedly infringing activity,^{Q3} the identity of all documents supporting such allegations; the identity of persons who are most knowledgeable about such allegations; and all other facts upon which you base your contention that Aeroflex knew that such allegedly infringing activity was infringing the '432 patent and that such infringement was willful.

INTERROGATORY NO. 3:

Identify all writings, including, but not limited to, opinions of counsel, that indicate, reflect, or comment upon whether any product, including, but not limited to Aeroflex's products, infringes or does not infringe any of the claims^{Q3} of the '432 patent, including, but not limited to, the exact or approximate date the writing was created; the identity of any product which is the subject of the writing; all facts forming the basis of the writing; the identity of all documents supporting the writing; and the identity of persons who are most knowledgeable of the facts contained within the writing.

Claim 13

INTERROGATORY NO. 4:

Identify all communications, including, but not limited to, opinions of counsel, whether initiated or received by you or submitted or communicated by you to another, referring or relating to any comment, advice, or opinion concerning the validity or invalidity, the enforceability or unenforceability, or the scope of the '432 patent, including, but not limited to, the identity of all documents referring or relating to such communication, and the identity of the persons who are most knowledgeable of the facts contained within such communication.

INTERROGATORY NO. 5:

1432 Patent

Identify all prior art and alleged prior art to the ~~Kobayashi Patents~~ known to Ricoh that is relevant, or has been asserted by others (excluding Aeroflex) to be relevant to the ~~Kobayashi Patents~~, and separately state as to each item of prior art the date that Ricoh became aware thereof.

INTERROGATORY NO. 6:

For Claim 13 of the '432 patent
~~Separately for each claim of the '432 patent that Ricoh alleges is infringed by Aeroflex,~~
describe the conception of the invention claimed therein, including, but not limited to, all facts supporting or corroborating such conception; the identity of the project in which such conception occurred; the identity of all persons involved; the identity of all documents corroborating such conception; and the identity of all persons who are most knowledgeable of such conception.

INTERROGATORY NO. 7:

For Claim 13 of the '432 patent
~~Separately for each claim of the '432 patent that Ricoh alleges is infringed by Aeroflex,~~
describe the reduction to practice of the invention claimed therein, including, but not limited to, all facts supporting or corroborating such reduction to practice; all facts supporting or corroborating reasonable diligence in such reduction to practice; the identity of the project in which such reduction to practice occurred; ~~the identity of all prior unsuccessful attempts;~~ the identity of all persons involved; the identity of all documents corroborating such reduction to practice; ~~(the identity of all documents corroborating such reasonable diligence in such reduction to practice;~~ ~~and the identity of all persons who are most knowledgeable of such reduction to practice;~~ ~~and the identity of all persons who are most knowledgeable of such reasonable diligence in such reduction to practice.~~

INTERROGATORY NO. 8:

For Claim 13 of the '432 patent
~~Separately for each claim of the '432 patent for which infringement is being alleged,~~
describe the first sale, the first offer for sale and the first public use (in accordance with the meaning of those terms pursuant to 35 U.S.C. section 102(b)) of the invention claimed therein,

including, but not limited to, the date each event occurred; all facts that support or corroborate each such event; and the identity of all parties involved; the identity of all documents referring or relating to each such event; and the identity of the persons who are most knowledgeable of each such event.

INTERROGATORY NO. 9:

Identify each named inventor of the '432 patent, such identification to include, without limitation, whether the named inventor is currently employed at Ricoh; the named inventor's most current contact information, if not currently employed at Ricoh; and identification of all documents produced by Ricoh taken from the named inventor's files or other personal archive or repository.

INTERROGATORY NO. 10:

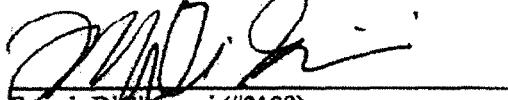
~~Identify all products or processes manufactured, used, or sold by Ricoh that embody, practice, or use any of the inventions claimed in the '432 patent. State in complete detail how each identified product or process satisfies each element of such claim.~~

INTERROGATORY NO. 11:

Describe, in detail, every instance in which any of Ricoh, International Chip Corporation, Knowledge Based Silicon, or any subsidiary or agent of any of the above, has discussed the '432 patent with any other party or licensed, attempted to license, litigated, threatened litigation, or otherwise attempted to enforce the '432 patent with any other party. Include in the response an identification of all documents and communications referring or relating to each such instance.

Dated: June 5, 2003

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CERTIFICATE OF SERVICE

I, Francis DiGiovanni, hereby certify that on this 5th day of June, 2003, a true and correct copy of the foregoing was caused to be served on the attorneys of record at the following addresses:

VIA HAND DELIVERY

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Francis DiGiovanni (#3189)

PROOF OF SERVICE

2 STATE OF CALIFORNIA)
3 COUNTY OF SAN FRANCISCO) SS.:

I am employed in the County of San Francisco, State of California. I am over the age of 18 and not a party to the within action. My business address is 525 Market Street, Suite 3600, San Francisco, California 94105.

On March 17, 2006 I served on the interested parties in said action the within:

**AEROFLEX INCORPORATED'S RESTATED FIRST SET OF INTERROGATORIES
(No. 1 THROUGH 9)**

9 by causing said document to be sent by Electronic Mail on March 17, 2006 to the email addresses
10 indicated for the parties listed below and by placing a true copy thereof in a sealed envelope(s)
addressed as stated below and causing such envelope(s) to be delivered as follows:

11 Gary M. Hoffman, Esq.
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(OVERNIGHT DELIVERY) on March 17, 2006 by depositing in a box or other facility regularly maintained by Federal Express, an express service carrier, or delivering to a courier or driver authorized by said express service carrier to receive documents, a true copy of the foregoing document in sealed envelopes or packages designated by the express service carrier, addressed as stated above, with fees for overnight delivery paid or provided for and causing such envelope(s) to be delivered by said express service carrier on.

I declare under penalty of perjury that I am employed in the office of a member of the bar of
this Court at whose direction the service was made and that the foregoing is true and correct.

24 Executed on March 17, 2006, at San Francisco, California.

Peter L. Kasnenko
(Type or print name)

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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

RICOH COMPANY, LTD.,)
Plaintiff,)
vs.)
AEROFLEX ET AL.,)
Defendants.))))
CASE NO. CV 03-4669 MJJ (EMC)
CASE NO. CV 03-2289 MJJ (EMC)

SYNOPSYS, INC.,)
Plaintiff,)
vs.)
RICOH COMPANY, LTD.,)
Defendant.)))

**CASE NOS. CV 03-4669 MJJ (EMC) AND CV 03-2289 MJJ (EMC)
MANUAL FILING NOTIFICATION**

